

AFFIDAVIT IN SUPPORT OF COMPLAINTS

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I, PETER OLESEN, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), and have been so employed since June 2008. I am currently assigned to the HSI Springfield Resident Agent in Charge (RAC) Office. Prior to my assignment to the Springfield RAC office, I was assigned to the HSI San Diego Special Agent in Charge (SAC) office, where I participated in the Internet Crimes Against Children (ICAC) task force in San Diego, California for more than eight years. This task force included members of the San Diego Police Department, U.S. Postal Inspection Service, Federal Bureau of Investigation, Naval Criminal Investigative Service, U.S. Attorney's Office and the San Diego County District Attorney's Office. While at the HSI San Diego office, I was also assigned to the Human Trafficking Group from June 2017 to February 2018. As a Special Agent with HSI, I am a law enforcement officer of the United States within the definition of 18 U.S.C. § 2510(7), and am empowered by law to conduct investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. As a Special Agent, I am responsible for initiating, conducting, and participating in criminal investigations involving allegations of various federal laws including drug trafficking, child pornography, human trafficking, and immigration violations. I have received training and gained experience in interviewing techniques, arrest procedures, search and arrest warrant applications, the execution of searches and seizures, and various other criminal laws and procedures. I have conducted and participated in numerous criminal investigations involving

human trafficking, child exploitation, immigration violations, and narcotics trafficking.

3. This affidavit is submitted in support of Criminal Complaints alleging that between January 2016 to present, within the District of Massachusetts and elsewhere, the defendants WILLIAM COLEMAN, VIRGINIA MALDONADO, JACLYN LEMELIN, and SHANNON ROBERTS committed violations of Title 18, United States Code, Section 1594(c), Conspiracy to Commit Sex Trafficking, and 18 United States Code, Section 371, Conspiracy to violate Title 18, Section 1952(a)(2), Interstate Travel to Promote Unlawful Activity.

4. The statements contained in this affidavit are based on my personal observations, as well as information obtained from other agents and witnesses, written reports about this investigation that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of subpoenas, the results of physical and electronic surveillance conducted by law enforcement agents, investigation and analysis by law enforcement agents and analysts and computer forensics specialists, and my experience training, and background in Homeland Security Investigations.

5. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested Criminal Complaints, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested Criminal Complaints.

THE SUBJECT OFFENSES

6. Title 18, United States Code, Section 1591(a) makes it illegal for anyone knowingly, in or affecting interstate commerce, (1) to recruit, entice, harbor, transport, provide, obtain, or maintain by any means a person, or (2) to benefit, financially or by receiving anything

of value, from participation in a venture which has engaged in an act described in violation of (1) above, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act.

7. Title 18, United States Code, Section 1952(a) states that “Whoever travels in interstate or foreign commerce or uses the mail or any facility in interstate or foreign commerce, with intent to—

- (1) distribute the proceeds of any unlawful activity; or
- (2) commit any crime of violence to further any unlawful activity; or
- (3) otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity, and thereafter performs or attempts to perform—

(A) an act described in paragraph (1) or (3) shall be fined under this title, imprisoned not more than 5 years, or both; or

(B) an act described in paragraph (2) shall be fined under this title, imprisoned for not more than 20 years, or both, and if death results shall be imprisoned for any term of years or for life.”

8. Title 18, United States Code, Section 1952(b) states that: As used in this section (i) “unlawful activity” means (1) any business enterprise involving gambling, liquor on which the Federal excise tax has not been paid, narcotics or controlled substances (as defined in section 102(6) of the Controlled Substances Act), or prostitution offenses in violation of the laws of the State in which they are committed or of the United States, (2) extortion, bribery, or arson in

violation of the laws of the State in which committed or of the United States, or (3) any act which is indictable under subchapter II of chapter 53 of title 31, United States Code, or under section 1956 or 1957 of this title and (ii) the term “State” includes a State of the United States, the District of Columbia, and any commonwealth, territory, or possession of the United States.

STATEMENT OF PROBABLE CAUSE

Introduction and Overview of COLEMAN Sex Trafficking Enterprise

9. In or about March 2018, HSI initiated an investigation of William COLEMAN and others pertaining to possible violations of Title 18 United States Code, Sections 1591, 1952, 2422, and 2421, and conspiracies and attempts to commit those violations. Based on information collected from publicly available websites, commercial databases, witness statements, surveillance observations, documentary evidence, and other information, there is substantial evidence showing that COLEMAN has been acting as a pimp to several young adult females engaged in commercial sex and that Virginia MALDONADO, Jaclyn LEMELIN, and Shannon ROBERTS have been acting in concert with him to help him run the sex trafficking enterprise.

10. This affidavit will set forth evidence showing the existence of a sex trafficking enterprise that will be referred to as the “COLEMAN Enterprise.” Each of the four people for whom Criminal Complaints are sought, COLEMAN, MALDONADO, LEMELIN, and ROBERTS, have occupied different roles that fit within the typical business model of sex trafficking organizations. This model is well understood by law enforcement and which has been observed in numerous investigations by federal, state, and local law enforcement officials.

11. In the typical pattern, a male pimp often designates a trusted female to rank above

the other females in the pimp's "stable." This trusted female is known as the "bottom bitch" or the "bottom." Despite the name, the "bottom" has authority over the other females engaging in prostitution, and the "bottom" may exercise supervision and visit violence upon female prostitutes who deviate from the rules and expectations of the pimp. It is not unusual, as the evidence in this investigation shows, for more than one female to have "bottom" status at different times, or for the pimp to have multiple females vie for "bottom" status at the same time. The "bottom" may or may not engage in prostitution "dates" with customers at the same time she is serving as a lieutenant to the pimp.

Roles of Defendants in COLEMAN Enterprise

12. COLEMAN is the pimp and the head of the sex trafficking organization. The world of pimping and prostitution is known as the "game." There are well-understood rules to the "game," and pimps usually maintain a strong belief that the rules need to be followed. These rules order the relationships between pimps and between pimps and prostitutes. The rules are based on the unquestioned supremacy of the pimp over the prostitutes working for him, and the rules, which often are arbitrary and strict, are designed keep the prostitutes on edge and fearful. The evidence in this case shows that COLEMAN maintains this position of supremacy over his sex workers. COLEMAN supplies drugs to his sex workers, engages in threats and violence against his sex workers, arranges for others to threaten and commit violence against his sex workers, transports sex workers to motels in Massachusetts and Connecticut, and travels to Massachusetts and Connecticut to check on his sex workers and to collect money from the prostitution of his sex workers. COLEMAN also receives prostitution proceeds via Paypal.

13. COLEMAN has an extensive criminal history. His record includes two felony

drug convictions in Hampden Superior Court in 1997 and 2007 that resulted in sentences of 5-6 years and 2.5 years, respectively. He was also convicted in 2003 of Threatening Murder, Witness Intimidation, Assault & Battery Dangerous Weapon, and Assault & Battery.

14. MALDONADO is the mother of COLEMAN's young child. MALDONADO has occupied the "bottom" role at times and has facilitated the running of the COLEMAN Enterprise by engaging in threats and violence against subordinate sex workers and serving as a link between COLEMAN and other members of the COLEMAN Enterprise while COLEMAN was in jail. MALDONADO has also engaged in prostitution for COLEMAN.

15. LEMELIN has also occupied the "bottom" role by engaging in threats and violence against subordinate sex workers in the COLEMAN Enterprise. LEMELIN has helped to secure rental cars and her own car for COLEMAN. LEMELIN has also engaged in prostitution for COLEMAN.

16. ROBERTS has also occupied the "bottom" role by delivering drugs to, collecting money from, and managing subordinate sex workers in the COLEMAN Enterprise. ROBERTS has also engaged in prostitution for COLEMAN.

Use of Drugs and Addiction in COLEMAN Enterprise

17. There is evidence that shows that many, if not all, of the young females associated with COLEMAN are addicted to illegal drugs, including heroin, and that COLEMAN is supplying the drugs. I know from my training and experience that drug-addicted women and girls are especially susceptible to becoming victims of sex trafficking. Opioid addiction can be so powerful that obtaining drugs to stave off the pain of withdrawal becomes the first priority in an addict's life. Pimps often use that desperation to control victims, most often women and

girls, and to coerce them into engaging in prostitution for the pimp. I know that supplying, withholding, and manipulating an addict's supply of drugs can constitute "coercion" and the use of force or the threat of force under 18 U.S.C. § 1591. *See United States v. Mack*, 808 F.3d 1074, 1081-83 (6th Cir. 2015).

Current and Historical Sex Workers for COLEMAN Enterprise

18. The evidence shows that approximately 20 females have worked for COLEMAN in the last three years. Some of the females have only been identified through stage names used in prostitution advertisements. Some have been identified with their real names. Currently, five sex workers are, to my knowledge, actively engaging, or have, within the last six weeks engaged, in prostitution for COLEMAN: Jaclyn LEMELIN, Shannon ROBERTS, Female A, Female B, and Female C. I have specific evidence in the form of text messages during the last two months that LEMELIN, ROBERTS,¹ Female A, Female B, and Female C are currently (or very recently) using drugs. Jail calls between COLEMAN and MALDONADO clearly indicate that MALDONADO was using drugs in Spring 2018.

Prostitution Advertisements Posted by COLEMAN Enterprise During 2016-Present

19. An analysis of advertisements posted on Backpage.com and other websites shows that there are a number of young females connected to COLEMAN, ROBERTS, MALDONADO, and LEMELIN, as well as to each other and to the same telephone numbers. This is one piece of evidence that these young females are engaged in a common enterprise

¹ After an October 24, 2018 car accident, ROBERTS was involuntarily committed under Massachusetts state law. At that point, there was strong evidence that ROBERTS was severely addicted to heroin. ROBERTS was administered Narcan after the car accident. ROBERTS admitted to police following an August 24, 2018 arrest, described below, that she was engaging in prostitution to buy heroin. She is currently not in custody.

headed by COLEMAN. Backpage.com was an internet website often used by those engaged in the business of prostitution. Backpage was divided into geographic regions, and it was widely known and widely used for prostitution. On January 9, 2017, the United States Senate Permanent Subcommittee on Investigations, Committee on Homeland Security and Governmental Affairs published a report (the “Senate Report”) entitled *Backpage.com’s Knowing Facilitation of Online Sex Trafficking*. The Senate Report called Backpage.com “the leading online marketplace for commercial sex.” It also noted that Backpage.com is “world’s second-largest classified advertising website” and that Backpage.com has been aptly called a “hub” for human trafficking.

20. Prostitution advertisements linked to the COLEMAN Enterprise that appeared on Backpage.com and other websites from the COLEMAN Enterprise tended to follow well-established patterns. They were, first of all, thinly veiled offers to engage in sex for money. There were typically sexually provocative pictures of the person being advertised. The advertisement contained a way for a customer to set up an appointment, which is called a “date” in the lingo used in the world of human trafficking. The means of contact is usually a cell phone number and is less often an email address. The advertisements sometimes had text that suggested, but does not explicitly state, that the pictured person is willing to engage in sex for money.

21. I know from my training and experience that the cell phone noted in a prostitution advertisement is almost always answered (through calls or texts) by the prostitute herself, her pimp, or a person designated by the pimp to arrange “dates” between the pictured person and the customer.

22. In addition to online marketplaces like Backpage.com, there are websites that allow commercial sex customers to review the services of prostitutes. These reviews are done entirely or almost entirely anonymously, and the reviews are typically intended to provide frank and valuable information to other commercial sex customers. One such review site is usasexguide.

23. A review of hundreds of online prostitution advertisements, telephone records, Facebook records, Paypal records, Backpage.com records, and other information show that the prostitution activities of numerous young adult females are connected to COLEMAN, ROBERTS, MALDONADO, and LEMELIN. Further, this evidence shows that the sex work of the women described below takes place in an organized, centralized fashion.

24. The vast majority of the prostitution advertisements summarized below and connected to the COLEMAN Enterprise contain pictures of the young adult females in sexually provocative poses and/or in a state of being partially clothed. The advertisements typically contain multiple photographs, and it is typical for the photographs to focus on a body part, such as the buttocks or the breasts. The large majority of these advertisements contain text, and the text makes it clear that sex is being offered. For example, the headline of a number of the advertisements for “Nicole” is “Throat Magician Come to Me & Cum in Me.”

25. Many of the advertisements suggest that the customer can purchase sex from two females, either from the pictured female and another unidentified female, or from two identified females, one or both of whom are pictured. For example, a picture with the text “2 girl sessions” appears in advertisements both for “Roxy” and for “Ali.”

26. Prostitution advertisements connected to the COLEMAN Enterprise are

summarized below, grouped together by the telephone numbers appearing in the advertisements. In most of the advertisements, a stage name is used to describe the female, and where the real name of the female has been listed, that is also listed. Some of the information used to identify the real names have come from Facebook accounts which have been seen publicly, and records of many of those accounts have been obtained through a search warrant. Because the advertisements are segregated by the online websites by geographic region, the commercial sex markets serviced by the females can be identified. Because commercial sex is a face-to-face business, there is a powerful business reason for the geographic regions listed in the advertisements to be accurate. A sex worker is most profitable for the pimp if she is in one place for a given day/night and can serve multiple customers without having to travel long distances between “dates.”

27. The advertisements show that most of the females traveled between Massachusetts and Connecticut, with the vast majority being advertised in the Springfield, MA and the Hartford, CT areas. This location information in the advertisements is consistent with other information gathered during the investigation.

28. In many cases, the same telephone number has been used for multiple females, indicating that the same telephone number has been passed between females in the COLEMAN Enterprise. The advertisements also show, in many cases, multiple females advertised together, indicating that customers can have the services of two females together. In some instances, words like “2 girl special” are used to make it explicit that the sexual services of two females can be purchased together. The use of the same telephone number and the advertising of females indicates that the activities are being coordinated and that they are not operating alone.

29. Backpage.com records have shown that a single Backpage account, the account associated with the roxystewart118@yahoo.com email address (the “roxystewart” account) posted one or more of the Backpage advertisements for the most of the telephone numbers summarized below.² In most cases, because of the nature of the telephone records or public records available, we have been unable to identify the subscriber for the telephone numbers. Where that information is available, it is listed.

Telephone Number in Advertisements	Stage Name/(Real Name) of Sex Worker(s)	Sex Workers offered together in ads	Time Period	Identified Backpage account used to post ads	States in which ads appeared	Subscriber to telephone number (if available)	Number of Ads
(413) 693-6446	-Sarah (Female B) -Leslie (Virginia Maldonado) -Nicole (Female D) -Kayla (Female C) -Ali (Female E) -Angie -Savannah Rose (Female A)	Nicole/Kayla Leslie/Ali Leslie/Nicole Leslie/Sarah	6/15/17-11/29/18	roxystewart Danielle.D73	RI, MA, CT	William COLEMAN	1200+
(413) 310-1714	(Shannon Roberts) Sarah (Female B) Kayla (Female C)	Roberts/Female B Roberts/Female C	12/28/17-6/8/18 ³	roxystewart	MA, CT	Female A	357
(214) 394-2988	(Female B)		1/29/18-2/13/18	roxystewart	NV, MA, CT		40

² To be clear, not all of the advertisements associated with each telephone number were posted by the roxystewart account. Some of the advertisements were not posted on Backpage, and the Backpage records did not indicate, in every case, the account which had posted the ads. The records did indicate, that the roxystewart account had posted at least one advertisement for almost all of the telephone numbers.

³ The ending date for the use of this telephone number in advertisements does not mean that this number is not being currently used. As discussed below, it has been used, at least until recently (October 2018) by ROBERTS. In addition, prostitution advertisements for ROBERTS continued to be posted into October 2018, and the recent advertisements for ROBERTS simply do not contain a telephone number. The online website, skipthegames, has a means for customers to reach sex workers or their pimps through an online messaging service, much like Craigslist employs. This allows communication with the sex worker without placing the telephone number in the advertisement.

(860) 936-8756	Kayla (Female C) (Shannon Roberts) Roxy (Female F)	Female C /Roberts Female C/ Female F	10/27/17- 6/8/18 ⁴	roxystewart	MA, CT		584
(413) 426-0863	(Female B)		2/25/18- 6/8/18	roxystewart	MA, CT		197
(413) 930-5025	Danielle		12/12/16- 12/26/16	roxystewart	MA, CT		61
(413) 685-2149	Pamela (Female G)		4/17/17- 5/27/17	roxystewart	MA, CT		152
(413) 735-3974	Pamela (Female G)		5/25/17- 6/22/17	roxystewart	MA, CT	currently used by COLEMAN	169
(860) 572-6825	Crystal		3/9/17- 3/24/17	roxystewart	MA, CT		71
(413) 275-4397	Buttercup, aka Sonja Smiles, butterfly		6/23/16- 4/26/17	roxystewart	MA, CT		59
(413) 883-3416	Candy		6/23/16- 4/26/17	roxystewart	MA, CT		18
(413) 570-3807	Petite Brunette		5/3/17- 7/31/17	roxystewart	MA		182
(413) 517-5623	Treasure		12/8/17- 1/2/18	roxystewart	MA, CT		18
(413) 930-5301	Kylie Angie		2/15/17- 6/15/17	roxystewart	MA, CT		492
(413) 222-4208	Nevaeh Arianna Nicole (Female D)		5/3/17- 7/31/17	roxystewart	MA		98
(857) 417-5111	Lexi		4/5/17- 6/8/17	roxystewart	MA, CT		464
(413) 693-9001	-Sarah (Female B) -Ali (Female E) -Nicole (Female D) -Leslie (Virginia Maldonado) -Alexis (Female H)	Sarah/Ali Ali/Nicole Ali/Leslie Alexis	9/6/17- 11/29/18	roxystewart	MA, CT		1100+
(413) 221-3291	Alexis (Female H)		11/24/17- 12/8/17	roxystewart	CT		24
(413) 523-6603	MALDONADO/Leslie ROBERTS Female B	MALDONADO/ Female B	8/17/17- 7/14/18		RI, CT, MA		356
(413) 977-9703	Serenity (LEMELIN)		11/3/17- 10/24/18		MA, CT		229

⁴ The ending date for the use of this telephone number in advertisements does not mean that this number is not being currently used. Prostitution advertisements for Female C continue to be posted into the last week of November 2018, and the recent advertisements for Matos simply do not contain a telephone number. The online website, skipthegames, has a means for customers to reach sex workers or their pimps through an online messaging service, much like Craigslist employs. This allows communication with the sex worker without placing the telephone number in the advertisement.

(413) 735 3845	Lexi		8/25/18- 8/27/18		MA, CT	Number given to Female C by COLEMAN 8/29/18	7
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Facebook Information

30. Publicly available information on Facebook indicates that William COLEMAN has a Facebook page. Among his Facebook friends are females who are pictured in the prostitution advertisements summarized above.

31. COLEMAN is Facebook friends with a female with the Facebook vanity name of Virginia MALDONADO, who is mother of COLEMAN's child. The Facebook vanity name is often, but is not always the user's real name. From a review of the publicly available pictures on Maldonado's Facebook account, it appears that Maldonado is the female denoted as "Leslie" in the prostitution advertisements. Other information gathered during the investigation, including COLEMAN's text messages, COLEMAN's Facebook messages and postings, and COLEMAN's jail calls corroborate the fact that COLEMAN and MALDONADO share a child together.

32. COLEMAN is Facebook friends with a female with the Facebook vanity name of Female E. From a review of the publicly available pictures on Female E's Facebook account, it appears that Female E is the female denoted as "Ali" in the prostitution advertisements.

33. COLEMAN is Facebook friends with a female with the Facebook vanity name of Female B. From a review of the publicly available pictures on Female B's Facebook account, it appears that Female B is the female denoted as "Sarah" in the prostitution advertisements. Witness 1, who knows Female B well, has identified "Sarah" pictures from the prostitution

advertisements as Female B, and Witness 1 has indicated that Female B is her real name. Two Facebook posts by Female B relating to her living in Dallas in the fall of 2017 and January 2018, and to a trip Female B took to Las Vegas at the end of January 2018, corroborate Witness 1's chronology of events relating to Female B.

34. COLEMAN is Facebook friends with a female with the Facebook vanity name of Female C. From a review of the publicly available pictures on Female C's Facebook account, it appears that Female C is the female denoted as "Kayla" in the prostitution advertisements.

35. COLEMAN is Facebook friends with a female with the Facebook vanity names of Female D and Female D. These are two separate accounts and both are Facebook friends with COLEMAN. The pictures from each account indicate that both accounts are for the same person. From a review of the publicly available pictures on the two Female D Facebook accounts, it appears that Female D is the female denoted as "Nicole" in the prostitution advertisements. The Female D Facebook account includes a post by Female D which references Female B. The post contains a picture of two deer stuck in a fence with the caption, "When u and ur friend both fuck up but at least ur in it together." Female D states, "Female B this is us LOL real talk." The Female D Facebook account also includes a February 27, 2017 post in which Female D states that she is "going to detox" and will be closing down this Facebook account. This suggests that Female D, like Female B, suffers from drug addiction.

36. COLEMAN is Facebook friends with a female with the Facebook vanity name of Female G. From a review of the publicly available pictures on Female G's Facebook account, it appears that Female G is the female denoted as "Pamela" in the prostitution advertisements.

37. COLEMAN is Facebook friends with a female with the Facebook vanity name of

Female H. From a review of the publicly available pictures on Marie's Facebook account, it appears that Marie is the female denoted as "Alexis" in the prostitution advertisements.

38. COLEMAN was Facebook friends with a female with the Facebook vanity name of Shannon Lee ROBERTS. From a review of the publicly available pictures on Roberts' Facebook account, it appears that ROBERTS is the female depicted in a large number of the prostitution advertisements.

Female I & COLEMAN's Jail Calls About Sex Trafficking in 2017 & Evidence of Female I Working for COLEMAN in 2016

39. Female I was incarcerated at the Women's Correctional Facility in Chicopee, Massachusetts between approximately April 6, 2017 and October 6, 2017. While incarcerated, Female I communicated with a male who has been identified as William COLEMAN over the inmate phone system over a hundred times. Female I refers to the male on the line as "Will" and talks to the male about _____ "Male C", who has been identified as

_____.
40. Female I speaks with COLEMAN about recruiting women from within the facility to work as prostitutes for COLEMAN after their release. During one conversation Female I states to COLEMAN that her roommate gets out in a week and wants to work. Female I gives COLEMAN the name of the woman and tells him to look her up on Facebook, so he can see what she looks like. Female I tells COLEMAN that this woman is "down for good money." She also informs COLEMAN of the woman's release date, and COLEMAN states that he will pick her up.

41. During another conversation Female I and COLEMAN talk about a female who

they say either “dipped” on them or may have possibly overdosed. Female I tells COLEMAN that the woman owes her \$800 dollars and that she is going to fuck her up. Female I also states to COLEMAN there are mad girls in here and that she is about to recruit everybody. COLEMAN tells Female I that she can network more in population and she states that you know I will.

42. On December 1, 2017, Female I was returned to the Women’s Correctional facility in Chicopee Massachusetts after violation of her parole conditions. Parole reported Female I’s cell phone had text messages that indicated she may be involved in human trafficking and prostitution. She also had several motel room keys on her person, and she tested positive for narcotics.

43. The 2017 jail calls between COLEMAN and Female I about recruiting women in the jail for prostitution occurred after Female I had regularly transferred funds to COLEMAN via Paypal during 2016. The Paypal records are summarized below and they indicate, along with other evidence set forth in this affidavit, that the COLEMAN Enterprise accepted payments for commercial sex by Paypal (albeit a small percentage of the total) and that the proceeds of prostitution were transferred to COLEMAN’s Paypal account.

COLEMAN’S May 8, 2017 Arrest by Vernon Policed Department (VPD)

44. On or about May 5, 2018, HSI Springfield conducted law enforcement database queries regarding COLEMAN and through these queries and additional contact with the Connecticut Department of Correction (CT DOC), discovered that COLEMAN was in CT DOC custody at the time. Additional records pertaining to COLEMAN’s incarceration in Connecticut list an arrest date of May 8, 2017 and list the agency as Vernon.

45. HSI Special Agent (SA) Pete Olesen requested and subsequently obtained records from VPD in Vernon, CT, pertaining to COLEMAN's arrest on May 8, 2017. The VPD Case/Incident Report filed under Call For Service (CFS) Number 1700006938 list COLEMAN's address as 67 Maryland St, Springfield MA and describe the events leading to COLEMAN being charged with violation of Connecticut General Statute section 14-236, Failure to Drive in Proper Lane, and section 21a-277, Possession of Hallucinogen/Narcotic with Intent to Sell.

46. The report for CFS Number 1700006938 states that after COLEMAN was pulled over in the early morning hours of May 8, 2017, COLEMAN stated that he was on his way home. When asked why he was headed away from Springfield, COELMAN stated that he was attempting to follow his GPS and apparently missed a turn. COLEMAN granted consent for VPD personnel to search his person and 10 glassine wax paper folds containing a white powdery substance were found on COLEMAN's person. An additional 10 glassine wax paper folds containing a white powdery substance, and a plastic bag containing a white clumpy substance, were found in COLEMAN's vehicle. The white clumpy substance field-tested positive for the presence of cocaine, and the white powdery substance field-tested positive for the presence of heroin. A total of \$1024 in cash was also found on COLEMAN's person and in his vehicle.

47. After COLEMAN was transported to VPD, he was read his Miranda Rights and he then provided a statement, in which he admitted that he sold heroin and indicated that he had gone to a Motel 6 that night to purchase heroin and cocaine from a friend he identified as "Sarah". COLEMAN stated further that "Sarah" was an escort and that she sold drugs in Springfield, Hartford and Vernon. When asked how often he came to Vernon to sell drugs, COLEMAN replied "not that much".

COLEMAN's Spring 2018 Jail Calls with MALDONADO and ROBERTS

48. Recordings of calls made by COLEMAN while he was in custody in April and May 2018 as a result of his arrest by Vernon PD, were provided to HSI Springfield by CT DOC pursuant to a DHS Summons. These recordings document phone calls between COLEMAN and MALDONADO, and COLEMAN and ROBERTS, with third parties participating in some conversations.

49. Based on Facebook posts made by COLEMAN and MALDONADO, calls COLEMAN made from jail, and other information, COLEMAN and MALDONADO have a child together. In addition, MALDONADO has appeared in numerous prostitution advertisements listing various locations in Massachusetts and Connecticut, indicating that COLEMAN has acted as a pimp for MALDONADO as well as for other women. Many of these advertisements use the stage name "Leslie" and list the phone number 413-523-6603, which is the same number associated with MALDONADO in CT DOC records pertaining to COLEMAN's jail calls. During their calls while COLEMAN was in CT DOC custody, MALDONADO describes having obtained illicit drugs, referred to in the jail calls as "pow", "powder", "stuff" and "work", and having broken it down and provided it to Male A. Male A refers to Male A,⁵ a resident of 34 Shawmut Street, Springfield, MA, and the individual, according to COLEMAN's jail calls, left in charge of the COLEMAN enterprise while COLEMAN was in CT DOC custody. Male A has a Facebook page under the name "Male A Supra Smile" that contains numerous photos and videos depicting him. MALDONADO also told COLEMAN in one call that she was going to smack the

⁵ Jevon McNary has two firearms registered to him in Springfield, but his Firearms Identification card is expired.

shit out of Female B on the spot for how she flipped sides so quickly, in an apparent reference to Female B, one of the sex workers working for the COLEMAN Enterprise.

50. In another call, MALDONADO tells COLEMAN that she went to the house (an apparent reference to 34 Shawmut Street) and grabbed a bitch by the hair, then got into an altercation with another occupant of the residence. She further explains that she told Female C (an apparent reference to Female C, another sex worker in the COLEMAN Enterprise) to give her the phone and then had to pry it out of her hands. MALDONADO tells COLEMAN they (an apparent reference to women who had been working for COLEMAN) really think they are safe with Male A and that Male A has the girls corrupt, to which COLEMAN responds that it is because Male A has his (COLEMAN's) work. Based on my knowledge of the investigation, my training and experience, and specifically the references to drugs in COLEMAN's text messages, I understand these statements to mean that Male A (Male A) is gaining the loyalty of COLEMAN's sex workers through his control of COLEMAN's drugs. This conversation was in the context of other conversations in which MALDONADO was warning COLEMAN about Male A usurping COLEMAN's position as the head of the enterprise.

51. MALDONADO agrees, saying that [referring to the drugs] is what is controlling everything. MALDONADO also tells COLEMAN that Female C is not getting her phone back and reiterates that she is going to whoop Female B's ass. In this same call, COLEMAN states that he knows what he is doing with these females and that nobody is playing the game⁶ how it is supposed to be played. In a separate call, MALDONADO describes having suspended Female

⁶ I know from my training and experience and from other sex trafficking investigations that the "game" is a reference to the world of pimping and prostitution.

B's phone after MALDONADO told Female B to give her the phone if she knew what was best. COLEMAN also tells MALDONADO where a sock is hidden in her house that contained stuff Shannon (ROBERTS) needed after MALDONADO told COLEMAN that Shannon was not going to be well and she (MALDONADO) would need to go to their supply of narcotics for Shannon. I understand the reference to "stuff" as being the narcotics ROBERTS needed to not experience withdrawal.

52. MALDONADO and COLEMAN discuss in another call how Male A is doing things backwards, just giving stuff (referring to drugs) out and that is why the girls were comfortable and not even thinking about working, and how Male A does not know the game. I understand this conversation to mean that MALDONADO and COLEMAN feel that Male A was not running the business correctly by giving out drugs without making sure the girls were working (i.e., engaging in prostitution).

53. MALDONADO also relates to COLEMAN in another call how Shannon (ROBERTS) was complaining. MALDONADO says she told ROBERTS she did not care about ROBERTS' complaints, but she cared about ROBERTS working and that if she was not going to work then MALDONADO was not going to give her more stuff (referring to supplying ROBERTS with drugs). MALDONADO added emphasis to this point and reiterated it. MALDONADO also states in a separate call that she tried her hardest and tried to work with these girls.

54. Many prostitution advertisements depicting ROBERTS list the phone number 413-310-1714, which is the same number associated with ROBERTS in CT DOC records pertaining to COLEMAN's jail calls. COLEMAN discusses Male A (Male A) further in a call with ROBERTS in which ROBERTS tells COLEMAN that Male A was on his own plan, to which COLEMAN

responds that he (Male A) thinks he can take this business over and that he (Male A) is crazy. Later in the call, COLEMAN tells ROBERTS that he is going to fix things when he gets out and that this is just what happens when a person like him is not around. ROBERTS also tells COLEMAN that we have Female C's phone and that she (ROBERTS) changed Sarah's number and disconnected it, in an apparent reference to Female B (Female B's stage name is "Sarah").

55. ROBERTS relates to COLEMAN in another call how MALDONADO forced her to go see a client without anything even though ROBERTS said it was not a good idea because she always brought that client white (an apparent reference to cocaine). I understand this statement to mean that MALDONADO sent ROBERTS on a date without any drugs for ROBERTS' personal use. According to ROBERTS, MALDONADO said you got to do this, so ROBERTS went and MALDONADO sent her there sick (referring to ROBERTS' withdrawal pain from drugs), but ROBERTS said she would do it if MALDONADO really wanted her to and that she (ROBERTS) would get the money so they could get stuff.

56. In a later call with COLEMAN, while discussing her drug use, MALDONADO says that she broke most of it down and gave it to her, in an apparent reference to ROBERTS. COLEMAN says that this makes no sense if nothing is coming in. MALDONADO responds that she told her (ROBERTS) that she (MALDONADO) would not keep copping stuff (buying drugs to provide to ROBERTS) if she (ROBERTS) was not working.

57. While discussing ROBERTS having changed the passcode for a PayPal account, COLEMAN asks ROBERTS if she wants him to get at her and tells her that it better be all there and if he comes to get her she will not like it. I understand this to mean that COLEMAN expects all of the money in the Paypal account to be there, and COLEMAN was threatening to harm

ROBERTS if the money was not still in the account.⁷ In a separate call with ROBERTS, while discussing how Male A (Male A) had mismanaged the prostitution business and could have done better, COLEMAN says Male A could have done it with Female B (i.e., kept Female B working and earning money). COLEMAN noted and that she (Female B) would have put in work, but ROBERTS points out that he (Male A) was not feeding her (Female B's) habit the way she wanted and that is why she (Female B) was going back and forth (i.e., going back and forth in her loyalty between Male A and COLEMAN). COLEMAN responds saying that is exactly what it was.

Surveillance at 34 Shawmut and COLEMAN's Use of LEMELIN Vehicles to Check On Sex Workers in Second Half of 2018

58. On June 5, 2018 a pole camera was installed in the vicinity of 34 Shawmut Street, Springfield, MA.

59. On Wednesday June 6, 2018, COLEMAN is observed arriving at 34 Shawmut Street in a yellow Chevrolet Malibu at approximately 1449 hours and entering the residence. At approximately 1459 hours, a dark van parks on Shawmut Street near the residence and a Caucasian female, later identified as Female A, wearing a purple shirt and carrying a bag exits the vehicle and enters the residence. At approximately 1506 hours, the Caucasian female, Female A, who arrived in the dark van exits the residence and then departs the area in the dark van. At approximately 1508 hours, COLEMAN exits the residence and departs the area.

⁷ I know from my review of numerous prostitution advertisements for the Coleman Enterprise, including advertisements for ROBERTS, that potential customers were told that payment for sex could be made by Paypal. I know from subpoenaed Paypal records that there appear to be payments from customers into ROBERTS' Paypal account and that funds from that account were transferred to COLEMAN's Paypal account.

60. On Saturday June 9, 2018, COLEMAN is observed on three separate occasions between approximately 0825 hours and 2307 hours driving the yellow Chevrolet Malibu to 34 Shawmut Street and entering the residence. On one occasion he exited with a blue bag in his hand. On the same date at approximately 2028 hours a male arrives on a bike. He enters 34 Shawmut Street and exits minutes later. At approximately 2114 hours, a male is observed exiting a vehicle. He is observed entering 34 Shawmut Street and exiting minutes later. Based on my training and experience in numerous narcotics investigations this pattern of conduct is consistent with street level drug transactions.

61. On Sunday June 10, 2018, COLEMAN is observed arriving at 34 Shawmut Street in a yellow Chevrolet Malibu. He exits the vehicle and goes inside the residence. At approximately 1254 hours, a thin blond hair female exits the house and remains on the sidewalk looking down the street. She is wearing torn jeans and appears to be unkempt. While standing on the sidewalk she continuously moves and scratches her arms. This behavior is consistent with an individual who is addicted to heroin. At approximately 1258 hours, the female goes back inside 34 Shawmut Street.

62. On Wednesday June 27, 2018 at approximately 0900 hours, COLEMAN is observed pulling up to 34 Shawmut Street in a yellow Chevrolet Malibu. COLEMAN and a thin white female exit the vehicle. COLEMAN is observed walking the female to the front door. Once she is inside he immediately leaves. At approximately 0933 hours, a middle aged white male wearing shorts and boots is observed exiting an Audi. He is observed carrying a dark colored bag and he enters 34 Shawmut Street. At approximately 0953 hours, COLEMAN pulls up in a yellow Chevrolet Malibu. He goes inside for approximately nine minutes then exits driving away

in the Chevrolet Malibu. Based on my training and experience in human trafficking investigations, this pattern of conduct is consistent with an “in-call”, in which a commercial sex customer or “John” travels to the commercial sex provider’s location.

63. Between approximately August 6 and September 5, 2018 COLEMAN was observed operating a red Kia SUV bearing Maryland registration plate 1CX9737.

64. On August 7, 2018, SA Olesen contacted Enterprise after reviewing registration records for the red Kia indicating it was registered to EAN HOLDINGS LLC. Enterprise informed SA Olesen that the Red Kia was rented to Jaclyn LEMELIN (DOB: _____), _____, Chicopee, MA on August 6, 2018. Enterprise also told SA Olesen that the Red Kia had been reserved and prepaid for August 6-September 5, 2018.

65. Open source queries for LEMELIN revealed an individual with the same name, date of birth and address listed as those provided by Enterprise. The same queries also list an alias of Jaclyn Rose LEMELIN for this individual. COLEMAN is Facebook friends with a female with the Facebook vanity name of Jaclyn Rose. The female depicted in multiple photographs in the Jaclyn Rose Facebook account also appears hugging Virginia MALDONADO and dancing in a video posted to COLEMAN’s Facebook account on July 15, 2018. The same female also appears with COLEMAN and MALDONADO in a photograph posted to COLEMAN’s Facebook page on February 4, 2018.

66. On August 17, 2018, Special Agents Michael Morizio, Peter Olesen and Christopher Pandolfi conducted surveillance on the Red Kia which was being driven by COLEMAN. At approximately 1738 hours, SA Morizio observed Female B standing near the room doors located at the rear parking lot of the Red Roof Inn (Red Roof), located at 5 Hazard

Avenue, Enfield, CT 06082. At approximately 1900 hours, SA Morizio observed COLEMAN drive the Kia and park in the rear lot at the Red Roof. COLEMAN walked up to room 139, and the door was opened by Female B. COLEMAN went inside the room for a short period of time. He then left room 139 at approximately 1910 hours. SA Morizio observed Female B remain in room 139, and COLEMAN left the Red Roof parking lot in the Kia alone. Agents then followed COLEMAN directly to Springfield, MA where he parked and went into 34 Shawmut Street, Springfield, MA at approximately 1930 hours.

67. On August 24, 2018, a Caucasian Female was observed exiting 34 Shawmut Street, Springfield MA, 01108 and departing in a 2006 Green Chrysler Town and Country Van bearing registration plate 1CY887, registered to Male D DOB: _____, _____, Agawam, MA, 01101. After being pulled over by the Springfield Police Department, the driver of the vehicle was identified as Female A DOB: _____, _____, Agawam, MA. Throughout the course of the stop the officers inquired as to where she was coming from prior to the stop and she reported from Benson Bagel on Sumner Avenue. Female A also reported to the officers that her friend "Ginie" lived around the corner at 67 Maryland Street. Upon viewing a Massachusetts Registry of Motor Vehicles (RMV) photograph of Female A, Agent Olesen recognized her as matching an individual he had observed at the Red Roof Inn, 5 Hazard Ave, Enfield, CT 06082 on August 20, 2018. At approximately 1330 hours, Agent Olesen observed Female B walking away from the Red Roof Inn, Enfield towards a nearby shopping complex. He then observed the Red Kia bearing Maryland registration 9CX9737 arrive at the Red Rood Inn and park alongside the back rooms. Female A got out of the Kia, went to the door of room 139 and waited there before returning to the vehicle. A second female, who was short with dark hair and consistent with

MALDONADO, then got out of the Kia and knocked on the door and attempted to look in the window of room 139, before returning to the vehicle. At approximately 1335 hours, Female B returned on foot. She conversed with the occupants of the Kia before entering room 139. Female A briefly went to the door of room 139 before returning to the vehicle and departing the area at approximately 1338 hours

68. On September 5, 2018, William COLEMAN was observed departing 34 Shawmut Street in the Red Kia. COLEMAN and the Red Kia were observed minutes later at 67 Maryland Street. Approximately a half hour later, Jaclyn LEMELIN was observed arriving at the Enterprise located at 765 East Columbus Avenue in Springfield, Massachusetts, 01105 in the Red Kia. LEMELIN was observed entering Enterprise and exiting approximately fifteen minutes later. LEMELIN was observed departing in a dark blue Mazda CR-5 MA Tag 8AT153.

69. On September 5, 2018 at approximately 1619 hours, COLEMAN was observed arriving at 34 Shawmut Street in the blue Mazda. COLEMAN was observed entering 34 Shawmut Street and exiting six minutes later departing in the blue Mazda.

70. On September 6, 2018, at 1024 hours, SA Olesen observed COLEMAN departing from 34 Shawmut Street with two Caucasian females in a vehicle matching the description of the blue Mazda. SA Olesen then observed COLEMAN and multiple Caucasian females, including the two females seen departing 34 Shawmut Street, in the parking lot of the Baymont Inn and Suites, 260 Main Street, East Windsor, CT 06088. COLEMAN and the females were going to and from the vehicle matching the description of the blue Mazda and the hotel. COLEMAN subsequently departed the area at approximately 1104 hours in the vehicle matching the description of the blue Mazda. SA Olesen observed the vehicle matching the description of the blue Mazda

back at 34 Shawmut Street later that day and confirmed its license plate matched that of the blue Mazda at approximately 1530 hours.

71. Records from the Massachusetts Registry of Motor Vehicles (RMV) indicate that the blue 2018 Mazda CX5 Sport Utility, bearing Massachusetts registration plate 8AT153, vehicle identification number JM3KFBDM6J0366036, is registered to EAN HOLDINGS LLC at 14002 East 21st Street STE 1500; Tulsa, OK 74134 NNSV records further list the insurance company as Safeco Insurance. Open source queries for EAN HOLDINGS LLC indicate that this company does business as Enterprise-Rent-A-Car (“Enterprise”). Enterprise provided information indicating that the Mazda CX5 was rented in the name of Jaclyn LEMELIN, 96½ Meeting House Road, Chicopee, MA.

72. Throughout this investigation numerous vehicles have been observed arriving at 34 Shawmut Street after which either the operator, passenger or both exited the vehicle and entered the residence via the front door. These subjects almost always exited the residence shortly thereafter. Based on my training and experience and my conversations with law enforcement personnel with experience in numerous narcotics investigations, this pattern of conduct is consistent with street level drug transactions. In my experience, as well as that of law enforcement personnel with whom I have discussed this topic, drug dealers will often times utilize the concealment of a dwelling to conduct their narcotic sales and will also often use their vehicles to obtain, transport and/or distribute narcotics.

Tracker Information for Vehicles Used by COLEMAN and COLEMAN Associates

73. From August 1, 2018 to present, law enforcement agents have used GPS trackers on three separate vehicles used primarily by COLEMAN⁸ to ascertain his whereabouts and his travel. These trackers were installed after obtaining federal tracker warrants. These three vehicles include the Yellow Chevrolet Malibu and a Red Kia referenced above, as well as a Gray Hyundai⁹ that he is currently operating.

74. The trackers show a consistent pattern across all three vehicles. COLEMAN's change of vehicles occurred because the Malibu was involved in an accident, the Kia was a short-term rental, and because another rental car was crashed by ROBERTS, resulting in COLEMAN using the Gray Hyundai registered to LEMELIN.

75. The trackers have shown that COLEMAN stays overnight almost all the time either at 34 Shawmut Street, Springfield, MA or 67 Maryland Street, Springfield, MA. The trackers also have shown that COLEMAN travels to motels in Connecticut where investigators have seen sex workers for COLEMAN or motels where commercial sex is known to take place.

76. The tracker information is consistent with COLEMAN delivering drugs to his sex workers, checking on his sex workers, and picking up money from his sex workers. All of these activities are typical, based on my training and experience, for a pimp to engage in.

Use of 34 Shawmut Street and 67 Maryland Street

⁸ On August 14, 2018, ROBERTS was observed driving the Red Kia from Maryland Street, Springfield, MA to a house in Glastonbury, Connecticut. After spending approximately 45 minutes inside the house, ROBERTS drove back to Springfield. On August 29, 2018, ROBERTS was observed driving the Red Kia from 34 Shawmut Street to a motel in West Springfield, MA. After spending approximately 30 minutes inside a motel room, ROBERTS left and then returned to 34 Shawmut Street. This conduct is consistent with ROBERTS engaging in out-call prostitution dates.

⁹ The Gray Hyundai is registered to Jaclyn LEMELIN.

77. As described above, there is evidence that 34 Shawmut Street, Springfield, MA functions as a drug distribution point. This address also functions as a place for COLEMAN's sex workers to spend overnights when they are not engaging in prostitution in motel rooms. Since the summer of 2018, ROBERTS has been observed at this address, as well as Female A. The pole camera has also recorded females at 34 Shawmut whose appearances are consistent with the look of Female B and Female F. The Enfield police report for ROBERTS' arrest on August 24, 2018 for prostitution lists ROBERTS' address as 34 Shawmut Street, Springfield, MA. Witness 1 has reported that he dropped off Female B less than a block from 34 Shawmut. As noted above, COLEMAN also uses 34 Shawmut as a place to spend overnights. It is common for pimps to have sex with their sex workers.

78. The residence at 67 Maryland Street, Springfield, MA is primarily a residence for COLEMAN, MALDONADO, and Male C, the _____ of COLEMAN and MALDONADO. COLEMAN's Massachusetts driver's license is active and lists 67 Maryland Street as his address. MALDONADO's Massachusetts driver's license is revoked and lists 67 Maryland Street as her address. COLEMAN and MALDONADO have been observed by law enforcement departing and arriving to 67 Maryland on several occasions, including within the last week. In addition, Witness 1 has reported that he picked up Female B from Maryland Street in September 2017 on an occasion that Female B was seeking to escape COLEMAN.

FEMALE B and ROBERTS Arrested By Enfield Police Department August 24, 2018

79. On August 24, 2018 the Enfield Police Department and the FBI Violent Crimes against Children Unit conducted an operation targeting underage trafficking victims in the Town

of Enfield, CT. This operation was conducted at the Hampton Inn, 20 Phoenix Ave, Enfield, CT 06082.

80. A Special Agent with the FBI made contact via skipthegames.com, one of the websites that has functioned to replace Backpage as an online marketplace for commercial sex, with Shannon Roberts who posted her ad as “Shayna” at 413-310-1714. The Agent reported Roberts identified herself as “Shayna” when she arrived at the room at The Hampton Inn and stated to the undercover officer that it was \$300 for full service, which she said included oral and regular sex. Roberts was placed under arrest and the agent reported that Roberts was extremely distraught and during a follow up interview stated she had been a prostitute for a short period of time because she needed to buy heroin.

81. A Special Agent with the FBI made contact with Female B who posted her ad as “Sarah” at 413-693-9001. The Agent reported when Female B arrived at the Hampton Inn she entered the room and began conversing with the undercover officer. During the conversation, Female B agreed to accept \$300 in exchange for “full service”. Female B was placed under arrest and did not Female Aate during a follow up interview.

TEXT MESSAGE EVIDENCE

COLEMAN and (413) 735-3974

82. The phone number 413-735-3974 was activated with Verizon Wireless on August 18, 2018 according to the results of search warrants served on Verizon Wireless for data, including text messages, associated with this number. The phone number was previously active with T-Mobile. Law enforcement indices queries identified this phone number as being registered to William COLEMAN as of June 2018.

83. Verizon reports that (413) 735-3974 was activated in the name Female A, 420 Main Street #87, Agawam, MA 10011.

84. Multiple prostitution advertisements posted to skipthegames.com in August and September 2018, including as recently as September 10, 2018, depict Female A and list the stage name “Savannah Rose” and the phone number 413-693-6446.

85. Based on my training and experience, it is a common practice for individuals involved in illicit activity to use a different name when activating cell phones and other electronic devices for the purpose of evading law enforcement detection. COLEMAN’s use of a phone number registered under the name of another person is consistent with his practice of using rental vehicles rented under the name of other people.

413-735-3974 Being Used to Advertise Prostitution

86. As summarized above, the phone number 413-735-3974 was listed in 169 prostitution advertisements for the time period May 24, 2017 to June 22, 2017, with all of the advertisements appearing on Backpage.com. The advertisements all show a female with the stage name of “Pamela.” The advertisements contain descriptive text, with all or almost all of the advertisements containing the following language: “I’m a bit older, some reviews say I’m bolder. Cuddlin’, kissin’ I’m sure you’ll approve me.” The advertisements show the face of “Pamela.”

87. The advertisements indicate that “Pamela” is 39 years old.

88. Almost all of the advertisements with the phone number 413-735-3974 contained pictures of “Pamela” in sexually provocative poses and/or in a state of being partially clothed. The advertisements contained multiple photographs of “Pamela,” and sometimes the

photographs focus on a body part, such as the buttocks or the breasts.

89. These advertisements are directed to specific geographic areas with all or almost all of the advertisements split between the Springfield, MA and Hartford, CT markets. This indicates that “Pamela” moved across state lines for servicing different commercial sex markets in Massachusetts and Connecticut.

90. Backpage.com records show that two advertisements for “Pamela” with the phone number 413-735-3974 413-735-3974 were submitted by the user account with the email address roxystewart118@yahoo.com, which has been used to post numerous other prostitution advertisements linked to COLEMAN.

91. Agents have identified Pamela’s true identity: Female G.

COLEMAN’s Recruitment of a Female Undercover Officer Used (413) 735-3974

92. On October 14, 2017, COLEMAN contacted an undercover law enforcement officer. The undercover officer (“UC”) was using an undercover Facebook account using a picture of a young, adult female.

93. On October 14, 2017, COLEMAN, using Facebook messenger, contacted the UC and began a series of messages that involved COLEMAN trying to recruit the UC into working as a prostitute for him.

94. The October 14, 2017, message stated, “Hello miss lady I’m will...we have a mutual friend that told me your interested in the business..if your serious u can make what she is, making with me..Don’t take my word ask her then contact me back..have a good weekend.”

95. On October 16, 2017, the UC responded, “hi . . U work for me . . duno if im feelin workin for someone . . . why work for someone else.” COLEMAN responded, “Np . . ally

brought it to me . . I didn't ask . . take care."

96. On November 26, 2017, the UC messaged COLEMAN and said, "Hey, been thinkin. What can u offer."

97. On November 26, 2017, COLEMAN responded, "Hey luv . . we can speak in person . . 413 735 3974." COLEMAN then sent another message, "Hey luv . . we can speak in person . . 413 735 3974 . . . also what's your size . . I can have my booster grab some stuff from Victoria secret."

98. On November 29, 2017, COLEMAN said, "We can meet later today or tomorrow . . also wanna bring u something."

99. On November 30, 2017, the UC said, "Not sure when I can get out that way."

100. On November 30, 2017, COLEMAN responded, "What's your location."

101. On December 1, 2017, the UC said, "im just on the fence . Will text us soon k."

102. On December 2, 2017, COLEMAN said, "Ok have a good weekend."

COLEMAN's Phone Number Provided to Female G on February 22, 2018

103. On February 22, 2018, COLEMAN initiated a conversation with Female G via Facebook Messenger with, "Hey Girl".

104. Female G replied, "What's up".

105. COLEMAN replied "Just saying hi... You in Florida still or mass".

106. Female G replied, "I am in mass still on probabtion (sic) can't leave till I am off".

107. COLEMAN replied, "Oh ok.. we need to get a drink one day".

108. Female G replied, "Yes we do real soon"

109. COLEMAN replied, "Text me your number. 413 735 3974... WYD tonight".

110. Female G replied, "I am not around tonite out in boston".

111. COLEMAN replied "Ok".

112. Female G replied, "Will be next weekend thoughb (sic).. My # is 4137771438 phone is shut off right now but will be on thurs".

113. Because the phone number 413-735-3974 had previously been used to post prostitution advertisements featuring Female G and the fact that Female G had a different phone number a few months later, I believe the number 413-735-3974 continued to be used by COLEMAN after the time the Female G prostitution advertisements were posted.

COLEMAN's Phone Number Provided to an Unidentified Individual via Facebook Messenger

114. On February 13, 2018, COLEMAN engaged in a Facebook Messenger conversation with an individual using the name Tanika Estabrook.

115. COLEMAN wrote, "Why are you calling me through facebook.. do I know you".

116. Estabrook responded, "It's tanika from Wentworth estate remember I kicked Harvey out I'm sick...I don't have ur number call me 627 1152...I'm lonely sick and need shit...call me"

117. COLEMAN replied, "413 735 3974".

COLEMAN's Phone Number Provided in Facebook Messenger Conversation as COLEMAN Admits to Pimping Female B, Female C, and ROBERTS

118. On March 9, 2018, COLEMAN engaged in a series of messages with another individual via Facebook Messenger. In the course of this online conversation, COLEMAN said: "I'm in spfld" "I lay low . ." "Doing the escort thing"

119. After stating that he was “doing the escort thing,” COLEMAN sent pictures of Female C, Female B, and Shannon ROBERTS, to which the other party responded, “O shit” “Those are your chicks” “?”

120. COLEMAN responded, “Yes.” He then said, “Shopping with one now lol . . getting there cosmetics.” After being asked, “How much you charge for the girls bro.” COLEMAN responded, “Anywhere from 100 qv (quick visit) to 250 hr . . fs (full service but I wouldn’t charge u like that.”

121. On March 15, 2018, COLEMAN told the same individual, again via Facebook Messenger, that he was at a casino, and he said, “girls working casino.” The other party then asked, “O OK big \$ there?” COLEMAN replied, “yea.”

122. On March 19, 2018, COLEMAN stated further that “One girl made 2000 6 hrs yesterday.” COLEMAN then sent a picture of Shannon Roberts, followed by the statement, “She did.” COLEMAN also sent pictures of Female B, “Roxy,” “Treasure,” and a picture of COLEMAN, Virginia MALDONADO, and Jaclyn LEMELIN. During the same conversation, COLEMAN also provided his phone number as 413-735-3974.

COLEMAN’s Phone Number Provided in Another Facebook Messenger Conversation

123. On March 17, 2018, an individual using the Facebook Messenger name LadyRed Torres wrote to COLEMAN, “I’ve been trying to hit up your cell phone but you never respond”.

124. COLEMAN replied, “413 735 3974”.

COLEMAN’s Phone Number Contacts Victims and Co-Conspirators via Facebook Calls, Phone Calls, and/or Text Messages

Female B

125. Multiple prostitution advertisements posted to skipthegames.com between August 2018 and November 29, 2018 depict Female B and list the stage name “Sarah” and the phone number 413-693-9001.

126. Phone toll analysis identified that COLEMAN’s phone number (413-735-3974) contacted 413-693-9001 844 times between August 20, 2018, and September 18, 2018.

127. Witness 1 who knows “Sarah” well and is familiar with her prostitution activities has identified a picture of “Sarah” and has given her real name, Female B. Witness 1 has arranged for a “date” with Female B, and it appears that he has purchased commercial sex from other women. Witness 1 has denied having had sex with Female B, but also has said he is in love with her. The circumstances suggest that Witness 1 probably did have sex with Female B. Witness 1 has personal knowledge that Female B has a severe heroin addiction, as also indicated by a usasexguide reviewer.

128. Witness 1 has reported that Female B told him, in or around September 2017, that she had been beaten up, pistol-whipped, and made to do sexual things she would otherwise not have done by her pimp.

129. On October 2, 2018, a federal search warrant (18-MJ-3122-KAR) was served on Verizon Wireless for text messages and written communications stored by Verizon Wireless and associated with the phone number 413-735-3974. Data produced by Verizon Wireless in response to this search warrant included numerous text messages exchanged between 413-735-3974 and the phone number 413-693-9001, as well as additional text messages pertaining to Female B. Data produced by Verizon Wireless in response to this search warrant also included the following text messages exchanged between Female B and COLEMAN’s phone number:

-----Text Message for date/time - 2018-09-01T14:26:09.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136939001]

Message Contents

That was a warning .. you could of gotten trashed.. if u dont appreciate what I do go back to holyoke..

-----Text Message for date/time - 2018-09-17T19:15:57.000Z-----

Message Subject:

Source Address: 4136939001

Destinations: [4137353974]

Message Contents

I deserve jeanie to beat my ass and u to fire me please let me show you that i will make it right im literally shaking scared i want to run away but u deserve for me to at least br honest and take the consequence i deserve

-----Text Message for date/time - 2018-09-21T07:08:21.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136939001]

Message Contents

If u speak to Chris again while u around me .. not only will I fire u but I will get u jumped ..do u understand

130. On October 19, 2018, a second federal search warrant (18-MJ-3134-KAR) was served on Verizon Wireless for text messages and written communications stored by Verizon Wireless and associated with COLEMAN's number, as well as with Shannon ROBERTS' number of 413-310-1714. Data produced by Verizon Wireless in response to this search warrant included additional text messages exchanged between COLEMAN's number and Female B's number of 413-693-9001. These exchanges included the following:

-----Text Message for date/time - 2018-10-19T20:22:24.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136939001]

Message Contents

Go check the website and 5 minutes guess what I'm better than you God is good too I'm all in your ship I'm going to destroy you right now

-----Text Message for date/time - 2018-10-19T04:24:11.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136939001]

Message Contents

If u arent back at the room when I get it that phone is going off.. what u think ima keep it on

-----Text Message for date/time - 2018-10-18T07:43:37.000Z-----

Message Subject:

Source Address: 4136939001

Destinations: [4137353974]

Message Contents

Hey i have someone in springfield 120qv uber me there n back is that ok

-----Text Message for date/time - 2018-10-18T02:50:03.000Z-----

Message Subject:

Source Address: 4136939001

Destinations: [4137353974, 4133101714, 4137353974]

Message Contents

I reposted like 20 min ago want me to repost Female A too?

Jaclyn LEMELIN

131. Multiple advertisements posted to skipthegames in August, September and October and including as recently as October 24, 2018, depict Jaclyn LEMELIN listed in skipthegames posts as "Serenity" and the phone number 413-977-9703. The locations list Hartford, Connecticut and MA. One such advertisement reads as follows: " Well hello there .. Q What's up everyone??! My name is Serenity available now, I am located in CT MA. Fresh on the scene and new to the area I am very excited to make some new friends and explore every thing

that comes my way. Fiesty, Hot, Spicy and Sweet... let's indulge together! Call or text now , anxiously awaiting to entertain and please. You deserve to be taken care of and I know just how to make you feel complete. I am able to travel to your home , arriving conveniently on your doorstep with discretion. Incalls available Half hour Hour sessions --Serenity--(413)977-9703--☺)))".

132. Data produced by Verizon Wireless in response to the first search warrant also included the following exchanges between COLEMAN's phone number and other phone numbers, including LEMELIN's number (413-977-9703), regarding Female B and apparently referencing the same incident referred to above as "a warning" in the text message listed above as sent from COELMAN's number on September 1, 2018:

-----Text Message for date/time - 2018-09-01T14:04:24.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Threaten the fuck outta Female B

-----Text Message for date/time - 2018-09-01T14:04:50.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

When she do a play I'll give u 50 out of it today

-----Text Message for date/time - 2018-09-01T14:04:46.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Can i hit her or na

-----Text Message for date/time - 2018-09-01T14:05:01.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]
Message Contents
Not the face

-----Text Message for date/time - 2018-09-01T14:05:11.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4139779703]
Message Contents
Gut check one time

133. Shortly after telling LEMELIN to assault and threaten Female B, COLEMAN confirmed to another person that he had done so:

-----Text Message for date/time - 2018-09-01T14:41:12.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4134171650]
Message Contents
Lol gm.. I sent jackie to punch out Female B ..

-----Text Message for date/time - 2018-09-01T14:41:33.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4134171650]
Message Contents
She went do it again

134. The Verizon Wireless data also included the following exchange between COLEMAN and LEMELIN's phone numbers discussing LEMELIN committing violence against Female B again:

-----Text Message for date/time - 2018-09-03T10:10:43.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4139779703]
Message Contents

U up

-----Text Message for date/time - 2018-09-03T10:11:08.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
Barely lol whats up wyd

-----Text Message for date/time - 2018-09-03T10:11:33.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4139779703]
Message Contents
Come to house please.. info on Female B ..

-----Text Message for date/time - 2018-09-03T10:11:51.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
What happened

-----Text Message for date/time - 2018-09-03T10:12:05.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4139779703]
Message Contents
Or I'll have shan call u

-----Text Message for date/time - 2018-09-03T10:12:20.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
Ok yea lmk whats going on

-----Text Message for date/time - 2018-09-03T10:13:08.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents

Is Female B there?!!?

-----Text Message for date/time - 2018-09-03T10:17:57.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

My bd not gonna come inside just wait outside in car

-----Text Message for date/time - 2018-09-03T10:18:00.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Yes

-----Text Message for date/time - 2018-09-03T10:18:00.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Shes calling

-----Text Message for date/time - 2018-09-03T10:18:10.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

And imma fuck Female B up face shots all that

-----Text Message for date/time - 2018-09-03T10:18:39.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

I got it.. thx tho ..

-----Text Message for date/time - 2018-09-03T10:19:29.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

R u sure?! He just dont want me to drive cuz i been drinking geting fuckd up but ill go slaughter that bitch right now

-----Text Message for date/time - 2018-09-03T10:21:11.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

He just wanna drive me and make sure i get there and back safely i can have him park up the street i anything

-----Text Message for date/time - 2018-09-03T10:22:17.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Nah none of that.. I'm all set ..

-----Text Message for date/time - 2018-09-03T10:22:24.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

I'll hit u later

-----Text Message for date/time - 2018-09-03T10:23:04.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

I told u he likes u from what i told him about u and respects u and ur hustle and that u pay me to handle these girls

-----Text Message for date/time - 2018-09-03T10:25:38.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Ok well lmk if u need me he really dont care and knows what we do and how i am im ready to fuck her up

-----Text Message for date/time - 2018-09-03T10:26:19.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

He said he'll bring a beer for u and yall can watch me fuck her up lmaooooo

-----Text Message for date/time - 2018-09-03T10:28:01.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

U want me to just come myself? And handle her quick?

-----Text Message for date/time - 2018-09-03T10:33:13.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Nah

-----Text Message for date/time - 2018-09-03T10:33:36.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

R u sure cuz i feel like just going there now

-----Text Message for date/time - 2018-09-03T10:34:37.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

He will stay here im good to drive he just was worried but i got this and i wanna fuck her up she fucked up tellin that guy all that and acting like that there

-----Text Message for date/time - 2018-09-03T10:47:00.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

I'm sure.. I got it thx

-----Text Message for date/time - 2018-09-03T17:18:31.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

What happen to Female B...i can come over still if u want

-----Text Message for date/time - 2018-09-03T17:18:35.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Fully rested now

-----Text Message for date/time - 2018-09-03T17:18:59.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Rejuvenated ...i was drunk af last night

-----Text Message for date/time - 2018-09-03T17:32:00.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

All set thx tho

135. Data produced by Verizon Wireless in response to the second federal search warrant included additional text messages exchanged between COLEMAN and LEMELIN's phone numbers, including the following message from LEMELIN to COLEMAN in which LEMELIN offers again to do violence:

-----Text Message for date/time - 2018-10-18T06:38:12.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Thank u, i love u too homie!!You're welcome, anytime n shes outta line and been on some dumbshit latley i wish u would a let me punch her in the mouth atleast once lmao i dont feel those body shots do justice lol.. plus she kept tryna cross

her arms and cover herself so i dont feel she really got it like she should of but she def got the message i hope her behavior improves but i doubt it she to focused on work n getting high thats all she seems to really care about.

136. Data produced by Verizon Wireless in response to the second federal search warrant also included text messages exchanged between LEMELIN and ROBERTS' phone numbers, including the following exchange, which apparently references LEMELIN committing violence against ROBERTS, likely in the same instance that she did the same to Female B given that the texts are on the same date as those discussing LEMELIN threatening, gut checking and punching out Female B:

-----Text Message for date/time - 2018-09-01T20:55:42.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4133101714]

Message Contents

I do feel bad that i had to go there like that but u girls are getting outta line and u have to understand that this is a business and a team and u need to conduct urselves in a certain manner so please lets move forward because i really like u girls and see alot of potential in u

-----Text Message for date/time - 2018-09-01T20:57:18.000Z-----

Message Subject:

Source Address: 4135220669

Destinations: [4133101714]

Message Contents

I live in the Town of Whately, just north of Northsmpton.

-----Text Message for date/time - 2018-09-01T21:11:46.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4135220669]

Message Contents

Okay hun I'm not to far from therehow long did you want to get together for

-----Text Message for date/time - 2018-09-01T21:14:36.000Z-----

Message Subject:

Source Address: 4133101714
Destinations: [7742005087]
Message Contents
Hey what's going on hun

-----Text Message for date/time - 2018-09-01T21:18:24.000Z-----
Message Subject:
Source Address: 7742005087
Destinations: [4133101714]
Message Contents
U I. Worcester

-----Text Message for date/time - 2018-09-01T21:18:49.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4139779703]
Message Contents
Please dont f33l bad Jackie truly. I of course want to move forward I'm so
disgusted with myself I shud of never let myself get that exhausted that my head
isn't processing

-----Text Message for date/time - 2018-09-01T21:19:54.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4139779703]
Message Contents
My surroundings or being aware of my mouth and movements

-----Text Message for date/time - 2018-09-01T21:30:41.000Z-----
Message Subject:
Source Address: 4139779703
Destinations: [4133101714]
Message Contents
Just learn and grow from this...next time just try to lay down and get rest, with
everything that's been going down these last few weeks patience for all this
drama is running very low...take a nap so u can be focused tonight

-----Text Message for date/time - 2018-09-01T21:43:27.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4139779703]
Message Contents

Instead it was running with fictional bullshit that my head decided to rail road myself with as if that makes any sense. But I apologize again and please dont feel bad I completely respect you protecting him someone has too...but not for one moment did I feel anamosity towards you how cud I. That's why when Male B kept saying next time stand up and fight back I wud never. I can't bring myself to hit someone that I'm furious with never cud I do that with someone I respect and I truly do Jackie it's nice finally seeing someone around that I can look up to

137. Data produced by Verizon Wireless in response to the second federal search warrant also included text messages exchanged between ROBERTS and other individuals, including the following exchanges, which apparently reference the same instance of LEMELIN committing violence against ROBERTS discussed above:

-----Text Message for date/time - 2018-09-01T16:41:04.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4132375499]
Message Contents
I nerf a few minutes Jackie was just hitting me

-----Text Message for date/time - 2018-09-01T16:42:00.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4132375499]
Message Contents
She's not gonna let me leave right this sec

-----Text Message for date/time - 2018-09-01T16:42:07.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4132375499]
Message Contents
She's gotta go first

**Text Messages between COLEMAN and LEMELIN About ROBERTS' Car Accident on
October 24, 2018 with COLEMAN's Child in the Car**

138. In addition to the red Kia and blue Mazda described above, both of which

LEMELIN rented and both of which were then operated by COLEMAN, LEMELIN also filed a report with the Chicopee Police Department on or about October 26, 2018, stating that her Nissan Sentra, which was rented from Sixt Rental Company, had been stolen. Shannon ROBERTS was arrested after crashing this vehicle into multiple other vehicles on October 24, 2018 according to a Springfield Police report detailing the incident. In the police accident report, Male C, the _____ of COLEMAN and MALDONADO, is described as having been in the car ROBERTS was driving. ROBERTS tried unsuccessfully to flee the scene with Male C. Male C's address is listed as 67 Maryland Street, Springfield, MA, a location not distant from the accident site. LEMELIN and COLEMAN discuss how to deal with this rental car and the accident in text messages obtained pursuant to a third federal search warrant for Verizon Wireless (18-MJ-314I-KPN):

-----Text Message for date/time - 2018-10-25T23:42:55.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

I'm at the police station now making this report I'll let you know how everything goes and keep you posted when everything

-----Text Message for date/time - 2018-10-25T23:43:06.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Aight

-----Text Message for date/time - 2018-10-25T23:45:21.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Just tell ginnie if enterprise calls her the reason why she took the car was because of emergency with her son and that's the only reason why she took it

I'm gonna do everything on my end to make sure neither one of us get in trouble but shannon goin down she already has a larceny charge so itll look like thats just how she moves

-----Text Message for date/time - 2018-10-25T23:45:57.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

I took the transponder for the masspike lmk if u need it tho

-----Text Message for date/time - 2018-10-25T23:46:13.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Ok

-----Text Message for date/time - 2018-10-25T23:47:28.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Whats the sixt car info u still got it ? I dont remember the info about the car u got the paperwork? Imma check my emails now too

-----Text Message for date/time - 2018-10-25T23:48:06.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Theres a damn line here smh

-----Text Message for date/time - 2018-10-25T23:48:26.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Smh

-----Text Message for date/time - 2018-10-25T23:43:28.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents
Shes fucked dumb bitch

-----Text Message for date/time - 2018-10-25T23:48:49.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
Whats the make n model or any info on the rental

-----Text Message for date/time - 2018-10-25T23:49:07.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
I don't got any email from them smh

-----Text Message for date/time - 2018-10-25T23:49:52.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4139779703]
Message Contents
Fuck.. Nissan Altima.. cj has it so they can give u the info

-----Text Message for date/time - 2018-10-25T23:54:14.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
He wont give me any info over the phone because theres no way to prove who i am

-----Text Message for date/time - 2018-10-25T23:50:11.000Z-----

Message Subject:
Source Address: 4139779703
Destinations: [4137353974]
Message Contents
Ok ill call now

-----Text Message for date/time - 2018-10-26T00:01:45.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4139779703]
Message Contents

Damn

-----Text Message for date/time - 2018-10-26T00:08:04.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Oh my God I'm an idiot I went down to the Springfield police department but that girl Address in Chicopee so I have to go to the Chicopee police department I am just gonna go back to my aunt's house That way I can call the rental car company in the morning and get all the car information for the police report And then I'll call the insurance company and deal with all this tomorrow

-----Text Message for date/time - 2018-10-26T00:08:47.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

U went to spfld wth

-----Text Message for date/time - 2018-10-26T00:09:35.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Smh im a mess I figured because the car rental company is in Springfield and the accident was on Sumner av

-----Text Message for date/time - 2018-10-26T00:10:25.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Sometimes I just be moving too fast And not thinking I should have known that I have to make the report in the town the vehicle was stolen from

-----Text Message for date/time - 2018-10-26T00:11:07.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4139779703]

Message Contents

Sit back gather thoughts then move

-----Text Message for date/time - 2018-10-26T00:12:01.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Yeah it's already been a long day and a long week I didn't get much sleep last night worrying about the kids in you and ginnie I'm bout to go get a bottle of wine relax of my aunt go to bed early tonight get some rest saw be clear headed and focus for everything I have to do tomorrow

139. Data produced by Verizon Wireless in response to the second search warrant also included text messages exchanged between COLEMAN's number and MALDONADO's phone number of 413-523-6603 regarding an argument and/or fight between MALDONADO and LEMELIN. One such text message from MALDONADO to COLEMAN reads as follows:

-----Text Message for date/time - 2018-10-09T21:56:32.000Z-----

Message Subject:

Source Address: 4135236603

Destinations: [4137353974]

Message Contents

Lol phone thug she know where I live. Id advise your worker if she plans on working tred carefully this time I'm not drunk and I'm not your other girls there will be no BODY SHOTS! I OWN UP TO MY SHIT ONLY COWARDS PLAY THAT 2 FACE SHIT!

Shannon Roberts and 413-310-1714

140. The phone number 413-310-1714 is a Verizon Wireless phone number according to open source queries and the results of the second federal search warrant for Verizon Wireless. Multiple prostitution advertisements posted to skipthegames.com in August and September 2018, including as recently as September 23, 2018, depict Shannon Roberts and list the stage name "Shayna". ROBERTS is depicted in numerous online commercial sex advertisements with the phone number 413-310-1714 listed in 2018 and 2017.

141. Phone toll analysis identified that COLEMAN's phone number contacted ROBERTS' phone number of 413-310-1714 on 1,046 occasions between August 20, 2018, and

September 18, 2018.

142. Data produced by Verizon Wireless in response to the first search warrant included numerous text messages exchanged between COLEMAN and ROBERTS' phone numbers regarding arrangements for commercial sex appointments (referred to as "plays"), distribution of narcotics (referred to as "work", "patches", "pow" and "white") and collection of money, including the following:

-----Text Message for date/time - 2018-09-07T03:41:30.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

U sitting there with my rental for nothing

-----Text Message for date/time - 2018-09-07T03:41:39.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I have been I haven't been talking I just was here trying to be positive work my phone and get ready waiting for this guy to possibly come

-----Text Message for date/time - 2018-09-07T03:42:11.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I went right out the door earlier I'm serious will I'm not just talking

-----Text Message for date/time - 2018-09-07T03:42:21.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I'm taking in everything you say to me

-----Text Message for date/time - 2018-09-07T03:42:22.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Well be positive still.. I send for the rental and it's not positive anymore smh

-----Text Message for date/time - 2018-09-07T03:43:45.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

No you send to separate from me cause u dont want to be around me and I hate that and I'm applying everything you say and I just feel like shit

-----Text Message for date/time - 2018-09-07T04:34:17.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Rental coming back Jake has the keys ..so when u have a play u can use it but it goes back to Jake after

-----Text Message for date/time - 2018-09-07T04:35:02.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Okay

-----Text Message for date/time - 2018-09-07T04:35:34.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Female A got work when u make a play

-----Text Message for date/time - 2018-09-07T04:36:27.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I really hate that I've made you look at me with such disgust and disappointment and that you don't even want to be around me I really am

-----Text Message for date/time - 2018-09-07T04:44:50.000Z-----

Message Subject:

Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents
Done texting ..

-----Text Message for date/time - 2018-09-07T04:44:51.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I dont I absolutely hate that you think that of me I know what you do for me and I want to make you money I dont want to be a burden when your happy it makes me feel like I'm worth something and I want to be worth something so I keep going cause I dont want it stop. I'm not like that it disgusts me to have the one person I care about so much look at me so poorly and truly feel that way when u want u to feel the opposite and have been thinking I've started to turn things around and show that when clearly I haven't at all

-----Text Message for date/time - 2018-09-22T18:09:14.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Hey I was calling cause theres no work left and I have a play in storrs ct to go to for at least 600 so I wasnt sure if u wanted me to drop stuff off to Female A and if I cud get something to

-----Text Message for date/time - 2018-09-22T18:12:53.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

What u mean there's no work left

-----Text Message for date/time - 2018-09-22T18:13:02.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

I gave them plenty

-----Text Message for date/time - 2018-09-22T18:13:42.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

You told me to take from it last night before I left cause I only took 1.5 bs all day and I havent slept I went 90min drive to my play

-----Text Message for date/time - 2018-09-22T18:13:52.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

And then Female B got 7

-----Text Message for date/time - 2018-09-22T18:14:03.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Theres a 20 still I some a cpl to jackie

-----Text Message for date/time - 2018-09-22T18:14:47.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Wheres the patches

-----Text Message for date/time - 2018-09-22T18:15:29.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

I like it better when Female A has the work

-----Text Message for date/time - 2018-09-22T18:15:57.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I have 1 piece still and then Female B and Female A have theres but I have a 2hr play and an hour drive each way and I havent slept I dont want to be even more exhausted

-----Text Message for date/time - 2018-09-22T18:16:16.000Z-----

Message Subject:

Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents
U should of slept

-----Text Message for date/time - 2018-09-22T18:16:31.000Z-----

Message Subject:
Source Address: 4133101714
Destinations: [4137353974, 4133101714]
Message Contents
I got home from my play at 8 and then went and met Jackie

-----Text Message for date/time - 2018-09-22T18:16:46.000Z-----

Message Subject:
Source Address: 4133101714
Destinations: [4137353974, 4133101714]
Message Contents
When j got back here I was about to but then u called so I went to Female B

-----Text Message for date/time - 2018-09-22T18:16:46.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents
So I gotta give other work besides patches because u didn't sleep

-----Text Message for date/time - 2018-09-22T18:16:54.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents
I'm still losing out then

-----Text Message for date/time - 2018-09-22T18:17:21.000Z-----

Message Subject:
Source Address: 4133101714
Destinations: [4137353974, 4133101714]
Message Contents
If I didnt have a play i wud be fine

-----Text Message for date/time - 2018-09-22T18:17:25.000Z-----

Message Subject:
Source Address: 4137353974
Destinations: [4137353974, 4133101714]

Message Contents

Forget the appt then it's not worth it

-----Text Message for date/time - 2018-09-22T18:17:30.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Go to sleep

-----Text Message for date/time - 2018-09-22T18:18:07.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Its 600 and I'm pretty sure he wants cuddling which i told him was an extra 100 so it's probably a 700 play maybe more

-----Text Message for date/time - 2018-09-22T18:18:18.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Go to sleep

-----Text Message for date/time - 2018-09-22T18:19:06.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Will I want to go I figured I cud get some sleep when I got back til like 8 or 9

-----Text Message for date/time - 2018-09-22T18:19:35.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

I'm not giving work just for u to go to a play unreal

-----Text Message for date/time - 2018-09-22T18:20:29.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

I gave u 150 in pow

-----Text Message for date/time - 2018-09-22T18:20:44.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

And u took some from the girls shit

-----Text Message for date/time - 2018-09-22T18:20:47.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

U took 1 back remember but yes I got 100

-----Text Message for date/time - 2018-09-22T18:21:03.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Yeah I'm all set

-----Text Message for date/time - 2018-09-22T18:21:58.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I need to make that money he said he wanted to start with 2 hrs it cud be longer but I'd be gone for at least 4hrs minimum if it qasnt so long I wudnt even ask

-----Text Message for date/time - 2018-09-22T18:22:15.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

No

-----Text Message for date/time - 2018-09-22T18:22:20.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Stop asking

-----Text Message for date/time - 2018-09-22T18:22:43.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Female B will see plays for less tools today and work

-----Text Message for date/time - 2018-09-22T18:23:34.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I can have a really good day getting this money this early and then if my guy I've seen before comes thru too

-----Text Message for date/time - 2018-09-22T18:24:09.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

I'm not giving u work just to see a play.. that's final

-----Text Message for date/time - 2018-09-22T18:34:02.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

U put the money in the safe

-----Text Message for date/time - 2018-09-22T18:34:15.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Yeah

-----Text Message for date/time - 2018-09-22T18:34:32.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

How much u drop

-----Text Message for date/time - 2018-09-22T18:37:19.000Z-----

Message Subject:
Source Address: 4133101714
Destinations: [4137353974, 4133101714]
Message Contents
1000. 700 from me 100 from the play Female B did before I got there then 200 from the play she saw while I was there and Jackie was another 40 but I had to get gas to get down to norwalk and a pack of butts and the rental needs gas again

143. Data produced by Verizon Wireless in response to this search warrant also included the following exchange between COLEMAN and ROBERTS' numbers, again discussing the distribution of narcotics, as well as payment for commercial sex (referred to as a "donation"):

-----Text Message for date/time - 2018-09-12T23:34:17.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents
Remember that's 300 of pow

-----Text Message for date/time - 2018-09-12T23:35:03.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents
Understood?

-----Text Message for date/time - 2018-09-12T23:36:28.000Z-----
Message Subject:
Source Address: 4133101714
Destinations: [4137353974, 4133101714]
Message Contents
Huh? I know its300 he paid for it already it was part of the 500

-----Text Message for date/time - 2018-09-12T23:37:12.000Z-----
Message Subject:
Source Address: 4137353974
Destinations: [4137353974, 4133101714]
Message Contents

Oh ..

-----Text Message for date/time - 2018-09-12T23:37:18.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

That 500 had nothing to do with my donation it was for straight work I had said that in the car more than once....

-----Text Message for date/time - 2018-09-12T23:38:29.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Actually it wasn't more than once .. I was like how u didn't get any donation money as of then was the question

-----Text Message for date/time - 2018-09-12T23:40:13.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

How's it going there? Also did he even go to the bank

-----Text Message for date/time - 2018-09-12T23:44:44.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

I'm just so confused I dont want to fight I'll be okay with whatever that isn't what this is st this point even one day I'd be beyond grateful at this point. I don't even know what I did wrong to set this whole thing in motion. But anyways it's going good hes on a business call right this second but collett has hun stressed so I' told him I'd make the stress go away going to go change and give him q massage for a cpl and get his mind off that. That'd one thing I hate about crack whatever someone is feeling consumed them so when jts good jts great when jts bad its terrible.and yes he went to bank I got 800 cash

-----Text Message for date/time - 2018-09-12T23:46:47.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Ok.. that check should be pretty big them

-----Text Message for date/time - 2018-09-12T23:48:41.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Yes i was actually in the 2middle of breaking it down now

-----Text Message for date/time - 2018-09-12T23:49:32.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Ok

-----Text Message for date/time - 2018-09-12T23:49:42.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

As of right this minute I agreed to 2800 for my donation up til this point

-----Text Message for date/time - 2018-09-12T23:50:27.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Cause its been almost 12 but I left with you for a few and then my overnight discount I guess you can call jt

-----Text Message for date/time - 2018-09-12T23:51:55.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

And then that doesn't include the 500 I gave you for the white

-----Text Message for date/time - 2018-09-12T23:52:52.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

So right now 2800 is agreed with him

-----Text Message for date/time - 2018-09-12T23:53:06.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974, 4133101714]

Message Contents

Yes

-----Text Message for date/time - 2018-09-12T23:53:19.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Ok ty

-----Text Message for date/time - 2018-09-13T01:45:51.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4137353974, 4133101714]

Message Contents

Tom is enjoying that time good job

144. Data produced by Verizon Wireless in response to the second federal search warrant also included further text message exchanges between COLEMAN and ROBERTS' numbers, including the following about ROBERTS collecting money, COLEMAN supplying drugs, and a discussion about how to manage subordinate sex workers, Female B and Female A. COLEMAN also assures ROBERTS of her status within the organization, saying that she is "steal [sic] 2nd in command" (showing how "bottom bitch" status can be conferred or taken away by the pimp):

-----Text Message for date/time - 2018-10-18T15:28:27.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4133101714]

Message Contents

I left you your Brown and pao on a bed on the dresser by the TVI laugh work for Amy and Female B depends on who they see you can over to get the car from me just text when you get up

-----Text Message for date/time - 2018-10-15T16:41:46.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4133101714]

Message Contents

Drop the money in safe from last night Female F and Female B

-----Text Message for date/time - 2018-10-15T16:48:44.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4137353974]

Message Contents

Im omw

-----Text Message for date/time - 2018-10-15T16:52:35.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

I akready did last night hun

-----Text Message for date/time - 2018-10-15T16:53:41.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4133101714]

Message Contents

Oh ok

-----Text Message for date/time - 2018-10-08T10:03:27.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

And the way she was acting tonight and how she js handled in comparison to Female B i understand Female B feeling upset to a point.

-----Text Message for date/time - 2018-10-08T10:05:25.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

Female B is been being made to deal and have to change her bad behaviors while Female A has been gettin the fragile and friend card but shes not showing friend back and putting in the effort and care of making sure things are taken caee of and show appreciation instead shes getting worse and continuing them and still not listening or learning to progress and at least Female B finally is

-----Text Message for date/time - 2018-10-08T10:06:20.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4133101714]

Message Contents

Well what's the game plan

-----Text Message for date/time - 2018-10-08T10:06:41.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4133101714]

Message Contents

I'm going to text them and tell then you steal 2nd in command

-----Text Message for date/time - 2018-10-08T10:07:11.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4133101714]

Message Contents

U cannot show weakness every again in front of them period

-----Text Message for date/time - 2018-10-08T10:07:11.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

Female A isnt willing to own any wtong doing and change behaviors so they dknt happen its all just generic well im sorry but really not cause it happens again the bl9odbstain on her bed js from her and she got hlood on Female Bs blanket now too but pushed it off up until i spotted the blood on her pants and pin pointed it on her

-----Text Message for date/time - 2018-10-08T10:02:32.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

Honeslty Female B has not been the issue at all tonight. And the Female A we usually see compared to the Female A that slips up when jm around for longer time periods is muxh different

-----Text Message for date/time - 2018-10-08T10:07:20.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

Agreed

-----Text Message for date/time - 2018-09-28T05:50:41.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4137353974]

Message Contents

K I'm gave Female B hers got the 200 I'm gonna ask Female A what her game plan is for the night since she took the day off and depending what she says decide if she shud get a 1n1

145. Data produced by Verizon Wireless in response to the second federal search warrant also included text message exchanges between LEMELIN and ROBERTS' numbers, including the following about the how the sex workers are supplied drugs for engaging in prostitution:

-----Text Message for date/time - 2018-09-22T18:45:09.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4139779703]

Message Contents

That he wont share so it can never be worked out now he said the overhead for my plays aren't really worth it to him

-----Text Message for date/time - 2018-09-22T18:45:43.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4139779703]

Message Contents

Female B gets 45 in drugs for every 80 dollar play that's 35 left but she gets shit at scheduled times for free regardless

-----Text Message for date/time - 2018-09-22T18:46:12.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4139779703]

Message Contents

But giving me a b and a 50 of pow so 100 in work so I can make a minimum of 60p isn't worth it to him....

146. The following text indicates that ROBERTS was left to manage the COLEMAN

Enterprise temporarily:

-----Text Message for date/time - 2018-09-08T02:05:36.000Z-----

Message Subject:

Source Address: 4133101714

Destinations: [4139779703]

Message Contents

He took the day off for a change and left me in control of business

-----Text Message for date/time - 2018-09-08T01:58:38.000Z-----

Message Subject:

Source Address: 4139779703

Destinations: [4133101714]

Message Contents

R u with will?

Female A

147. Multiple prostitution advertisements posted to skipthegames.com in August and September 2018, including as recently as November 29, 2018, depict Female A and list the stage name "Savannah Rose" and the phone number 413-693-6446.

148. Witness 1 stated to Special Agent Morizio that if an individual were to text 413-

693-6446 and ask if she (Female A aka Savannah Rose) had a friend for a threesome, the requestor would receive a picture of Female B.

149. Telephone number 413-693-6446 was listed in over 1200 prostitution advertisements for the time period June 15, 2017 to November 29, 2018, with over 800 of those advertisements at Backpage.com. In addition to Female A, the advertisements showed seven different females with the advertised names of Sarah (Female B), Roxy, Nicole (Female D), Kayla (Female C), Ali (Female E), Leslie (Virginia MALDONADO), and Angie.

150. Phone toll analysis identified that COLEMAN's number contacted 413-693-6446 628 times between August 20, 2018, and September 18, 2018.

151. Data produced by Verizon Wireless in response to a third federal search warrant (18-MJ-3141-KPN) also included further text message exchanges between COLEMAN's Phone Number and FEMALE A's Phone Number (413-693-6446)

152. The results of the multiple search warrants for Verizon Wireless contained numerous text messages exchanged between COLEMAN's number and Female A's number of 413-693-6446, including the following about COLEMAN's direction of Female A's sex work, regarding arrangements for commercial sex appointments (referred to as "plays", "in calls", "in", "out calls", and "out"), posting online advertisements, and receiving narcotics (referred to as "work") from COLEMAN:

-----Text Message for date/time - 2018-10-04T21:27:23.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]

Message Contents

Next time u plan something with anybody during grind time u ask first

-----Text Message for date/time - 2018-10-27T05:10:15.000Z-----

Message Subject:

Source Address: 4136936446

Destinations: [4137353974]

Message Contents

Pucking

-----Text Message for date/time - 2018-10-27T05:10:48.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]

Message Contents

U had work to carry u through tonight u ran through it smh

-----Text Message for date/time - 2018-10-27T05:11:37.000Z-----

Message Subject:

Source Address: 4136936446

Destinations: [4137353974]

Message Contents

It carried me til morning

-----Text Message for date/time - 2018-10-27T05:12:07.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]

Message Contents

Bs.. I gave u 5 bags last night when I didn't even have to bring it

-----Text Message for date/time - 2018-10-27T17:25:25.000Z-----

Message Subject:

Source Address: 4136936446

Destinations: [4137353974]

Message Contents

I am posted ready to grind

-----Text Message for date/time - 2018-10-28T14:53:12.000Z-----

Message Subject:

Source Address: 4136936446

Destinations: [4137353974]

Message Contents

My gram had a stroke my dad is going to take me to hospital real quick to see her i wont be gone about an hour or so

-----Text Message for date/time - 2018-10-28T15:43:38.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]

Message Contents

Well you need to Grind ..

-----Text Message for date/time - 2018-10-28T15:45:06.000Z-----

Message Subject:

Source Address: 4136936446

Destinations: [4137353974]

Message Contents

I know have a regular coming at 330 i will do at least 400 today i promise

-----Text Message for date/time - 2018-10-28T23:12:23.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]

Message Contents

Its gonna be an outcall

-----Text Message for date/time - 2018-10-30T21:27:19.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]

Message Contents

Just repost it you make sure you take a shower before your next client

-----Text Message for date/time - 2018-11-01T18:13:17.000Z-----

Message Subject:

Source Address: 4137353974

Destinations: [4136936446]
Message Contents
Seem like your post agent posting
I posted I posted u 30 mins ago and u get a play.. it been like that the last week

-----Text Message for date/time - 2018-11-01T21:12:17.000Z-----
Message Subject:
Source Address: 4136936446
Destinations: [4137353974]
Message Contents
In 100

-----Text Message for date/time - 2018-11-01T22:53:42.000Z-----
Message Subject:
Source Address: 4136936446
Destinations: [4137353974]
Message Contents
Call me i have someone that wants to uber me to marriott in Windsor for hour..he
sent me picture of phone in hotel already....just need your ok.

-----Text Message for date/time - 2018-11-02T01:12:30.000Z-----
Message Subject:
Source Address: 4136936446
Destinations: [4137353974]
Message Contents
In 100

Female C

153. Publicly available information on Facebook indicates that Female C has a Facebook page. The following post is listed as being posted to Female C's Facebook account on August 29, at 7:30pm: "New cell 413 735 3845. Best surprise from my boo William J Coleman."

154. The following post is listed as being posted to Female C Facebook account on August 31, 2018 at 5:51pm: “On my way to a hotel to relax and chill eat some food watch some tv I got bogies and juice some candy and all that other good stuff in between if you knits know what I mean..lol im floating in cloud 9 and still loving my new phone that I got from someone special...william coleman...thanks again Will (woooo send it!!)”

155. Witness 1 stated to me that 413-735-3845 was being utilized by a female on skipthegames.com using the name “Lexi”. I confirmed that a female using the name Lexi was shown in prostitution advertisements from August 25, 2018, to August 27, 2018.

156. Multiple prostitution advertisements posted to skipthegames.com in August and September 2018, including as recently as November 27, 2018, depict Female C and list the stage name “Kayla.”

157. Toll records show that COLEMAN’s number contacted 413-735-3845 93 times between August 25, 2018, and August 27, 2018. In total, COLEMAN’s number contacted 413-735-3845 246 times between August 24, 2018, and September 17, 2018.

Female F

158. Multiple prostitution advertisements posted to skipthegames.com between April 24, 2018 and as recently as November 23, 2018, depict Female F listed in posts as “Roxy” and the phone numbers 413-222-4375 and 413-417-1650.

159. Toll records show that COLEMAN’s number contacted 413-222-4375 149 times between August 20, 2018, and September 15, 2018.

160. Toll records show that COLEMAN’s number contacted 413-417-1650 467 times between August 27, 2018, and September 18, 2018.

161. Numerous text messages exchanged between COLEMAN's number and Female F's numbers also discuss COLEMAN providing narcotics to Female F and Female F stealing merchandise from local stores for COLEMAN and providing the stolen goods to COLEMAN. It should be noted that COLEMAN referenced stolen merchandise in his conversation with the undercover police officer when he offered to provide garments from Victoria's Secret (a store selling sexy lingerie), courtesy of a his "booster" (slang term for a person who steals merchandise). It appears that Female F used to work for COLEMAN as a sex worker, a text from COLEMAN within the last two months indicated that Female F was working as a sex worker independently. The text messages also show that COLEMAN is currently supplying drugs to Female F and that Female F, as noted above, is stealing merchandise for COLEMAN.

Preference for Cash in Sex Trafficking & Evidence of Transmission of Prostitution

Proceeds via Paypal from Female F, Female I, and ROBERTS

162. While the commercial sex business operates largely on the basis of cash paid by the customer to the sex worker, there is evidence that the Coleman Enterprise solicited, on occasion, payment from customers by Paypal and that the proceeds of prostitution were directed to COLEMAN through Paypal. The preference for cash in the commercial sex business is based on several factors. Individuals involved in illegal activity generally prefer to use cash because it is largely untraceable, and criminals wish to avoid detection. The use of cash allows the customer's payment to be used immediately for the purchase of goods and services, and other forms of payment often require the use of a bank account, which some people do not have. In addition, the customer, beyond avoiding criminal liability for purchasing sex, has an incentive to avoid potential embarrassment, and the untraceability of cash helps to keep the use of prostitutes

secret.

163. Emails produced by Google pursuant to a federal search warrant (18-MJ-3087-KAR) for the accounts sroberts1027@gmail.com and williamj124@gmail.com included numerous emails documenting PayPal transactions in which ROBERTS sent COLEMAN money.

164. Paypal records produced pursuant to a subpoena show ROBERTS sent COLEMAN \$3,495 during February and March 2018. These payments to COLEMAN coincide with the period we know that prostitution advertisements depicting ROBERTS appeared on the internet, some of which explicitly stated that Paypal was accepted. They also roughly coincide with payments during the same time period made into ROBERTS' Paypal account. The payments into ROBERTS' Paypal account appear to be all from men, in amounts that are consistent with payments for sexual services. One example of this is a \$200 payment that ROBERTS' account received on March 18, 2018 at 1:33 am. A \$200 payment was then made from ROBERTS' account to COLEMAN's account on March 18, 2018 at 7:33 am.

165. Paypal records also show that the Paypal account of Female F (the name is spelled slightly differently in the Paypal records) transferred \$625 to the Paypal account of William COLEMAN during July and August 2018, which coincides with the period we know that prostitution advertisements depicting Female F appeared on the internet.

166. Paypal records also show that the Paypal account of Female I transferred \$6,731.99 to the Paypal account of William COLEMAN during January 2016 to January 2017.

Recent Interview with Historical Sex Worker for COLEMAN

167. On or about November 20, 2018, TFO Kelliher and I spoke with a witness

(Witness 2) with knowledge of some of COLEMAN's activities working women in the commercial sex industry. Witness 2 is one of the females previously identified in this affidavit and has been depicted in numerous prostitution advertisements during 2017. Witness 2 stated that she had met a male named "Will" through Facebook and identified a photograph of COLEMAN as "Will". According to Witness 2, COLEMAN told her he could put her up and she could make money. Witness 2 also told TFO Kelliher and myself that COLEMAN brought her narcotics and collected the money she made from commercial sex once or twice per day, leaving her only maybe \$10 at a time for food.

168. Witness 2 stated further that COLEMAN had a Puerto Rican female that worked with him and identified a photograph of MALDONADO as this female. Witness 2 described how MALDONADO was in charge of the dates and prices and would communicate to her when a client was arriving, what the client expected, and for what price. Witness 2 stated that both COLEMAN and MALDONADO took photographs of her for commercial sex advertisements and both posted these advertisements. Finally, Witness 2 stated that while working for COLEMAN, whom she described as taking advantage of addicted women, she worked out of a hotel in Massachusetts, but on one occasion provided commercial sex to a client in Connecticut.

Virginia MALDONADO

169. During the course of this investigation, as previously mentioned, HSI has learned that Virginia MALDONADO and COLEMAN have _____: Male C.

170. While COLEMAN was incarcerated after having been arrested by the Vernon Police Department, there were multiple phone calls between COLEMAN and MALDONADO. During one such conversation, MALDONADO tells COLEMAN that Shannon ROBERTS is

going to be sick and does not know what to do. COLEMAN tells MALDONADO where a sock with “stuff” that Shannon needs is hidden in the house. I believe that COLEMAN was referencing heroin he had stored at 67 Maryland Street.

171. As of November 26, 2018, a search of the CLEAR database identifies MALDONADO’s address as 67 Maryland Street, Springfield, MA, 01108.

COLEMAN’s Jail Calls with MALDONADO and ROBERTS

172. Recordings of calls made by COLEMAN while he was in custody in April and May 2018 as a result of his arrest by Vernon PD were provided to HSI Springfield by CT DOC pursuant to a DHS Summons. These recordings document phone calls between COLEMAN and MALDONADO and COLEMAN and ROBERTS.

173. Based on Facebook posts made by COLEMAN and MALDONADO, calls COLEMAN made from jail, and other information, it appears that COLEMAN and MALDONADO have a child together. In addition, MALDONADO has appeared in numerous prostitution advertisements, indicating that COLEMAN has acted as a pimp for MALDONADO as well as for other women. During their calls while COLEMAN was in CT DOC custody, MALDONADO describes having obtained illicit drugs, referred to in the jail calls as “pow”, “powder” and “work”, and having broken it down and provided it to Male A. Male A refers to Male A, a resident of 34 Shawmut Street, Springfield, MA, and the individual, according to COLEMAN’s jail calls, left in charge of COLEMAN’s enterprise while COLEMAN was in CT DOC custody. Male A has a Facebook page under the name Male A Supra Smile that contains numerous photos and videos depicting him. MALDONADO also told COLEMAN in one call that she was going to smack the shit out of Female B on the spot for how she flipped sides so

quickly, in an apparent reference to FEMALE B.

174. In another call, MALDONADO tells COLEMAN that she went to the house (an apparent reference to 34 Shawmut Street) and grabbed a bitch by the hair, then got into an altercation with another occupant of the residence. She further explains that she told Female C (an apparent reference to Female C) to give her the phone and then had to pry it out of her (Female C's) hands. MALDONADO tells COLEMAN they really think they are safe with Male A and that Male A has the girls corrupt, to which COLEMAN responds that it is because Male A has his (COLEMAN's) work. MALDONADO agrees saying that is what is controlling everything. MALDONADO also tells COLEMAN that Female C is not getting her phone back and reiterates that she is going to whoop Female B's ass. In this same call, COLEMAN states that he knows what he is doing with these females and that nobody is playing the game how it is supposed to be played. In a separate call, MALDONADO describes having suspended Female B's phone after MALDONADO told Female B to give her the phone if she knew what was best. COLEMAN also tells MALDONADO where a sock is hidden in her house that contained stuff Shannon (ROBERTS) needed after MALDONADO told COLEMAN that Shannon was not going to be well and she (MALDONADO) would need to go to their supply of narcotics for Shannon.

175. MALDONADO and COLEMAN discuss in another call how Male A is doing stuff backwards, just giving stuff out and that is why the girls were comfortable and not even thinking about working, and how Male A does not know the game.

176. MALDONADO also relates to COLEMAN in another call how Shannon (ROBERTS) was complaining and MALDONADO told her she did not care about that, she

cared about her (ROBERTS) working and that if she was not going to work then MALDONADO was not going to give her more stuff. MALDONADO added emphasis to this point and reiterated it. MALDONADO also states in a separate call that she tried her hardest and tried to work with these girls.

177. COLEMAN discusses Male A further in a call with ROBERTS in which ROBERTS tells COLEMAN that Male A was on his own plan, to which COLEMAN responds that he (Male A) thinks he can take this business over he is crazy. Later in the call, COLEMAN tells ROBERTS that he is going to fix things when he gets out and that this is just what happens when a person like him is not around. ROBERTS also tells COLEMAN that we have Female C's phone and that she (ROBERTS) changed Sarah's number and disconnected it, in an apparent reference to FEMALE B.

178. ROBERTS relates to COLEMAN in another call how MALDONADO forced her to go see a client without anything even though ROBERTS said it was not a good idea because she always brought that client white (an apparent reference to cocaine). According to ROBERTS, MALDONADO said you got to do this, so ROBERTS went and MALDONADO sent her there sick, but ROBERTS said she would do it if MALDONADO really wanted her to and that she (ROBERTS) would get the money so they could get stuff.

179. In a later call with COLEMAN, while discussing her drug use, MALDONADO says that she broke most of it down and gave it to her in an apparent reference to ROBERTS. COLEMAN says that this makes no sense if nothing is coming in and MALDONADO responds that she told her (ROBERTS) that she (MALDONADO) would not keep coping stuff if she (ROBERTS) was not working.

180. While discussing ROBERTS having changed the passcode for a PayPal account with her, COLEMAN asks ROBERTS if she wants him to get at her and tells her that it better be all there and if he comes to get her she will not like it. In a separate call with ROBERTS, while discussing how Male A could have gotten by, COLEMAN says he could have done it with Female B and that she would have put in work, but ROBERTS points out that he (Male A) was not feeding her (FEMALE B's) habit the way she wanted and that is why she (FEMALE B) was going back and forth. COLEMAN responds saying that is exactly what it was.

Current Whereabouts of ROBERTS, LEMELIN, Female A, and Female B

181. On November 26, 2018, ROBERTS checked in with the Massachusetts state probation office in Springfield. She has open cases in state court in Springfield. The state probation office reports that ROBERTS will be residing with her _____.

182. On November 26, 2018, a Springfield Police officer spoke to LEMELIN. She said she was "between" apartments and gave the following mailing address:
_____ Wilbraham, MA 01095.

183. On December 1, 2018, a prostitution advertisement on skipthegames in the Hartford, CT market depicting Female A stated that she was offering "in call hosting in Windsor." Similar advertisements offering "in call hosting in Windsor" were posted on a daily basis during November 2018 with the telephone number (413) 693-6446. "In call" dates are prostitution sessions in which the customer comes to the sex worker's location, which is almost always at a reasonably priced motel. This indicates that Female A is working and staying overnight in a motel in the Windsor, CT area.

184. On December 1, 2018, a prostitution advertisement on skipthegames in the

Hartford, CT and Springfield, MA markets depicting Female B stated that she was offering "hosting in Windsor locks." This indicates that Female B is working and staying overnight in a motel in the Windsor Locks, CT area, an area where there are multiple reasonably priced motels. Advertisements in the Hartford and Springfield markets depicting Female B were posted on a daily basis during November 2018.

PSD
12/3/18
185. On December 2, 2018, ^{SA Morizo} I went to the Quality Inn in Windsor Locks, CT and spoke ^{KAR 12/3/18} to an employee on the pretense that ^{he} I was conducting a missing person investigation. ^{SA Morizo} I was

^{SA Morizo} allowed to view certain records of the guests, and ^{he} I learned that Female A had a room registered to her at the Quality Inn. ^{SA Morizo} I showed pictures of Female B and Female A to the employee, and he indicated that they both were staying in the room registered to Female A. They are scheduled to check out on Monday, December 3, 2018, but the employee said he expected the women to extend their stay.

186. On December 3, 2018, at approximately 0800 hours, ^{SA Morizo} I went to the Quality Inn, 5 Ella Grasso Highway, Windsor Locks, CT, 06096 and spoke with "Sam", who was working the front desk. ^{SA Morizo} Sam is a different employee than the employee ^{SA Morizo} I spoke to on December 2, 2018. ^{SA Morizo} I provided an administrative subpoena requesting guest registration information, and Sam ^{SA Morizo} provided the information. As a result, ^{SA Morizo} I was able to identify Female A's room number as Room 252. The room has been registered to Female A since November 15, 2018. Female A's contact phone number provided to the hotel was 413-693-6446. Unprompted, Sam said that she (referring to Female A) is scheduled to check out on December 3, 2018 but that she (Female A) regularly extends her stay.

CONCLUSION

187. Based upon the foregoing, I respectfully submit that there is probable cause to believe that WILLIAM COLEMAN, VIRGINIA MALDONADO, JACLYN LEMELIN, and SHANNON ROBERTS committed violations of Title 18, United States Code, Section 1594(c), Conspiracy to Commit Sex Trafficking, and 18 United States Code, Section 371, Conspiracy to violate Title 18, Section 1952(a)(2), Interstate Travel to Promote Unlawful Activity.

Respectfully submitted,



Peter Olesen
Special Agent
Homeland Security Investigations

Sworn and subscribed before me this 3rd day of December, 2018.



HONORABLE KATHERINE A. ROBERTSON
United States Magistrate Judge